

# Indokem Limited

(CIN: L31300MH1964PLC013088)

**Registered Office:**

“KHATAU HOUSE,” Ground Floor  
Mogul Lane, Mahim (West),  
Mumbai - 400 016.

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**E-mail :** [iklsecretarial@gmail.com](mailto:iklsecretarial@gmail.com)

**Website:** [www.indokem.co.in](http://www.indokem.co.in)

10<sup>th</sup> July, 2020

To,  
**The Bombay Stock Exchange Limited,**  
Corporate Relations Department  
1st Floor, New Trading Ring,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

**Scrip Code: 504092**

**Subject: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020 under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Respected Sir/ Madam,

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we send herewith, Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020 issued by Ragini Chokshi & Co., Company Secretaries.

Request you to kindly take the same on records.

Thanking You

Yours Truly,

**For INDOKEM LIMITED**

**Sd/-**  
**Rajesh D. Pisal**  
**Company Secretary and Compliance Officer**

Encl: a/a



Tel 022-2283 1120  
022-2283 1134

## *Ragini Chokshi & Co.*

### *Company Secretaries*

34, Kamer Building, 5<sup>th</sup> Floor, 38 Cawasji Patel Street, Fort, Mumbai- 400 001

E-mail: [ragini.c@rediffmail.com](mailto:ragini.c@rediffmail.com)/[mail@csraginichokshi.com](mailto:mail@csraginichokshi.com)

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### **SECRETARIAL COMPLIANCE REPORT OF INDOKEM LIMITED FOR THE YEAR ENDED MARCH 31, 2020.**

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by **INDOKEM LIMITED** ("the listed entity")
- (b) the filings/ submissions made by the listed entity to the stock exchanges
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended March 31, 2020 ("Review Period") in respect of compliance with the provisions of:

- A. The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, guidelines issued thereunder; and
- B. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-



- A. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- B. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the Audit Period)**
- C. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- D. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the Audit Period)**
- E. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- F. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- G. Securities and Exchange Board of India (Issue and Listing of Non—Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- H. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- I. Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018 (To the extent applicable);

and based on the above examination, We hereby report that, during the Review Period:

- A. The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr.No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	<p><b>Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations &amp; Disclosure Requirements) Regulations, 2015</b></p> <p>The Listed Entity shall submit within 30 days from the date of publication of its standalone and Consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in relevant accounting standards for annual results to the stock exchanges and publish the same on its</p>	<p>The disclosure of related party transaction for the Financial Year ended March 31, 2019 pursuant to Regulation 23(9) of Securities and Exchange Board of India (Listing</p>	<p>The disclosure of related party transaction for the Financial Year ended March 31, 2019 pursuant to Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations &amp; Disclosure Requirements) Regulations, 2015 were filed by the Company on June 28, 2019 with a delay of 16 days.</p>





	website.	Obligations & Disclosure Requirements) Regulations, 2015 were not filed by the Company within the prescribed timeline i.e. June 12, 2019	
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- B. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our examination of those records.
- C. The following are the details of actions taken against the listed entity/its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:

Sr.No	Action taken by	Details of violation	Details of actions taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary
Not Applicable during the year under review				

- D. The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable during the year under review				



For Ragini Chokshi & Co

Makarand Patwardhan  
(Partner)

C.P.No: 9031

FCS No: 11872

UDIN: A011872B000431456

Place: Mumbai  
Date:09/07/2020