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www.insecticidesindia.com
CIN : L65991DL1996PLC083909



insecticides
(INDIA) LIMITED

ISO 9001:2015, 14001:2015 & 45001:2018



CERTIFIED COMPANY

Ref: IIL/SE/2021/3006/2
Dated: June 30, 2021

The Manager

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|---|---|
| Listing Compliance Department BSE Limited (Through BSE Listing Centre) | Listing Compliance Department National Stock Exchange of India Limited (Through NEAPS) |
| Scrip Code: 532851 | Symbol: INSECTICID |

Sub: Secretarial Compliance Report for the Financial Year Ended March 31, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, M/s Akash Gupta & Associates, Company Secretaries has submitted the Annual Secretarial Compliance Report for the Financial Year Ended March 31, 2021, enclosed herewith this letter.

This is for information and records.

Thanking You,
Yours Truly

For Insecticides (India) Limited

Sandeep Kumar
Sandeep Kumar
Company Secretary & CCO



Encl: As above

AKASH GUPTA & ASSOCIATES

COMPANY SECRETARIES

Secretarial Compliance Report of Insecticides (India) Limited for The Year Ended March 31, 2021

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

To,

The Board of Directors,
Insecticide (India) Limited

I have examined:

- All the documents and records made available to us and explanation provided by Insecticides (India) Limited (“the listed entity”),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2021 (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018: The Company has not issued any capital during the financial year 2020-21, hence the mentioned regulation is not applicable to the Company;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018



- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: The Company has not come with any ESOP or ESPS or share based employee benefits during the financial year ended on March 31, 2021, hence the mentioned regulations are not applicable to the Company;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: The Company had not issued or listed debt securities during the financial year ending March 31, 2021, thus the said regulations are not applicable to Company;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: As the Company had not issued or listed Non-Convertible and Redeemable Preference Shares during the financial year ending March 31, 2021, thus the said regulations are not applicable to Company;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client; and circulars/ guidelines issued thereunder;

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

- (a) The listed entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder;
- (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) As informed to us, there were no 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.
- (d) The reporting of actions taken against the Listed Entity to comply with the observations made in previous reports does not arise.




| Sr. No | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned) | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|---|---|---|--|
| 1. | Non-filing of a half yearly disclosures regarding related party transaction to stock exchanges under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with amendments thereto, | 2019-20 | The Company has duly filed the half yearly disclosure on related party transactions | The Management of the Company has declared to submit the required disclosure on related party transaction within the prescribed time under the regulations. |
| 2. | A delay in submission of disclosure to stock exchanges regarding acquisition of shares by the promoter to stock exchange as prescribed under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 | 2019-20 | The Company has duly filed the disclosures. | The management of the Company represented before us that the delay in submission of disclosure pertaining to acquisition of shares by the promoter as stated above was occurred due to |



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| | | | | restrictions imposed during COVID-19 Pandemic. |
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**For Akash Gupta & Associates
Company Secretaries**



Akash Gupta
(Prop.)
M. No. 30099
CP No. 11038

Place: Delhi
Date: 18.06.2021
UDIN: A030099C000481583