

27th May, 2022

DCS – Listing BSE Limited 1st Floor, New Trading Ring, Rotunda Building, P.J. Towers, Dalal Street, Mumbai – 411 001 Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block,
Bandra Kurla Complex (East), Mumbai – 411 051

Scrip Code - 506655

Scrip Symbol – SUDARSCHEM

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022

In terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed Annual Secretarial Compliance Report duly issued and signed by Mr. Rajesh Karunakaran, Practicing Company Secretary, Pune, for the year ended 31st March, 2022.

Kindly take the same on record.

Thanking You, Yours Faithfully,

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED

MANDAR VELANKAR

DGM – LEGAL & COMPANY SECRETARY



Encl: As above

RAJESH KARUNAKARAN COMPANY SECRETARY

C.P. NO. 6581, F.C.S NO. 7441

204 Pragati Towers, Opp.Shivajinagar S.T. Stand, Shivajinagar, Pune – 411005 - M- 9890320874-www.csrk.co.in-karunakaran2004@yahoo.com.

Secretarial Compliance Report of Sudarshan Chemical Industries Limited for the year ended 31st March 2022– Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

I Rajesh Karunakaran, Proprietor of Rajesh Karunakaran & Co., Company Secretaries, Pune, have examined:

- (a) all the documents and records made available to us and explanation provided by Sudarshan Chemical Industries Limited ("the listed entity / the Company");
- (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 31st March, 2022 ("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 (ListingObligations and Disclosure Requirements) Regulations,2015;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;



- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (f) Securities and Exchange Board of India (Registrars to an Issue and Share TransferAgents) Regulations, 1993 regarding the Companies Act and dealing with client, to the extent applicable;
- (g) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (h) Other SEBI Regulations as applicable.
 - and circulars/guidelines issued thereunder; and based on the above examination, I 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.	Compliance Requirement	Deviations	Observations /		
No.	(Regulations / Circulars / Guidelines		Remarks of the		
	including specific clause)		Practicing		
			Company		
			Secretary		
Nil					

- (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 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.	Action taken by	Details of	Details of action	Observations /				
No.		violation	taken e.g. Fines,	remarks of the				
			warning letter,	Practicing				
			debarment etc.	Company				
				Secretary, if any				
Nil								



(d) The listed entity has taken the following actions to comply with the observations made in previous reports:-

Sr.	Observations	Observations	Actions taken by	Comments of the		
No.	of the	made in the	the listed entity,	Practicing		
	Practicing	Secretarial	if any	Company		
	Company	Compliance	•	Secretary on the		
	Secretary in the	Report for the		actions taken by		
	previous	year ended		the listed entity		
	reports	•				
Nil						

(e) The listed entity has complied with the conditions mentioned in 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019, by modifying the terms of re-appointment of the Statutory Auditors of the Company and its Material Subsidiary. (Not applicable for the review period).

For RAJESH KARUNAKARAN & CO., COMPANY SECRETARIES

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RAJESH KARUNAKARAN COMPANY SECRETARY F C S No. -7441 C P No. -6581

UDIN- F007441D000408325

Peer Review Certificate no.1260/2021 dated 28th June 2021

Pune, 27 May 2022

