



TRANSCHEM LIMITED

11th May 2019

The Secretary
BSE Limited,
P. J. Towers,
Dalal Street, New Trading Ring,
Rotunda Building, Fort,
MUMBAI – 400 001

Dear Sir,

REF: COMPANY CODE NO. 500422.

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019

Dear Sir,

With reference to SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019 Company has engaged services of CS Amita Saxena, Company Secretary in Practice to check the compliance of all applicable SEBI Regulations and circulars/ guidelines issued thereunder and to submit Annual Secretarial Compliance Report for the year ended March 31, 2019.

Please find attached herewith the Annual Secretarial Compliance Report as issued by CS Amita Saxena for the year ended March 31, 2019 in the format as prescribed by SEBI for your record

Thanking you.

Yours faithfully,
For Transchem Limited

Neeraja Karandikar
Company Secretary (ACS 10130)



*Secretarial compliance report
of TRANSCHEM LIMITED for the year ended 31.03.2019*

I, CS Amrita Saxena, Company Secretary in Practice, have examined:

- (a) all the documents and records made available to me and explanation provided by TRANSCHEM LIMITED (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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 31/03/2019 (“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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 attracted during the year under review)
 - (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 attracted during the year under review)
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
(Not attracted during the year under review)
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
(Not attracted during the year under review)
 - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
(Not applicable)
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009
(Not attracted during the year under review)
- 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. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause	Deviations	Observations/Remarks of the Practicing Company Secretary
	NIL	NIL	NIL

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar 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. No.	Action taken by	Details of violation	Details of action taken e.g. fines warning letter debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any.
	NIL	NIL	NIL	NIL

- (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... (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
	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Place: Thane
Date: 11/05/2019

Signature:

CS Amita Saxena
FCS No.: 3964
C P No.: 3438

