

CERTIFICATE UNDER REGULATION 40(9) OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 FOR THE HALF YEAR ENDED 31st MARCH, 2020.

The Securities and Exchange Board of India vide gazette notification dated 8th June, 2018 and vide its press release dated 3rd December, 2018, amended Regulation 40 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and has mandated that the transfer of securities would be carried out in dematerialized form only w.e.f. 01st April, 2019. Further, SEBI vide its press release dated 27th March, 2019 clarified that the transfer deeds lodged prior to deadline and returned due to deficiency in the document may be re-lodged for transfer even after the deadline of 01st April, 2019.

Accordingly, on the basis of examination of the relevant documents relating to VINYL CHEMICALS (INDIA) LIMITED ('the Company') maintained and provided electronically by TSR Darashaw Consultants Private Limited, Registrar and Share Transfer Agents (RTA), pertaining to the period from 01st October, 2019 to 31st March, 2020 for the purpose of issuing a Certificate as per Regulation 40(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, We hereby certify that:

A) 1.a. The Company has delivered during half year ended on 31st March, 2020 share certificates relating to the transfer deeds lodged prior to 01st April, 2019 and re-lodged thereafter, received during the period from 01st October, 2019 to 31st March, 2020, within thirty days, as entered in the Memorandum of Transfers from the respective date of lodgment.

1. b. The Company has delivered during half year ended on 31st March, 2020 share certificates in respect of requests relating to transmission of securities and deletion of name received during the period from 01st October 2019 to 31st March, 2020, within thirty days, from the respective date of lodgment. As informed to us there were no requests relating to transposition of securities, sub-division (split), renewal, consolidation, exchange or endorsement of calls/allotment monies received during the said period.

B) Any other information, if applicable: Physical verification of the documents could not be done due to the lockdown on account of COVID-19 situation.

For Parikh & Associates

Place: Mumbai
Date: May 07, 2020

P. N. Parikh
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UDIN: F000327B000212924