

Excel Industries Ltd.



21st May, 2021

BSE Ltd. Listing Department, Pheeroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai-400 001 National Stock Exchange of India Ltd. Listing Department, Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai-400 051

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021

Ref: BSE Scrip Code: 500650; NSE Scrip Code: EXCELINDUS

Dear Sir,

In terms of Clause 3(b)(iii) of SEBI Circular No. CIR/CFD/CMDI/27 /2019 dated 8th February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021, issued by Mr. Prashant Diwan, Practicing Company Secretary on 21st May, 2021.

Kindly take the information on your record.

Thanking you,

Yours faith	fully,	
For Excel I	ndustries Limited	
SURENDRA	Digitally signed by SURENDRA KUMAR SINGHVI DN: c=IN, o=Personal, cn=SURENDRA KUMAR SINGHVI.	
KUMAR	serialNumber=5e70cc04c4ed00df99c82d f47d7291993b46a62124d4b36a2cb3ca6d 5a962295, postalCode=411030,	
SINGHVI	2.5.4.20=c7ba014f2f2b7307c1997f9ef176 a29267350493ff4f3a80c72ebba828326bf 9, st=Maharashtra Date: 2021.05.2117:12:32 +05'30'	
S K Singhy	i	
Company Secretary		

Encl: As above

Chemicals Business / Environment & Biotech Division Polymer Inputs / Pharmaceuticals Intermediaries/Veterinary API's Excel Industries Limited 184-87, S. V. Road, Jogeshwari (West), Mumbai-400102, Maharashtra, India. CIN: L24200MH1960PLC011807 E: excelmumbai@excelind.com T: 91-22-66464200 F: +91-22-2678 3657 W: http://www.excelind.co.in



SECRETARIAL COMPLIANCE REPORTOF EXCEL INDUSTRIES LIMITED FOR THE YEAR ENDED 31st MARCH, 2021

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

I have examined:

- (a) all the documents and records made available to me and explanation provided by **Excel Industries Limited** ("the listed entity"), through digital mode.
- (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, 2021 ("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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.
- (e) The Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018.

As per the representations made by the management and relied upon by me, during the period under review, provisions of the following regulations were not applicable to the Company:

- (a) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- (c) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (e) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; and
- (f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009.



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 Requirements (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		None	

- (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.	Action	Details of	Details of action taken e.g.	Observations/ remarks of the
No	taken by	violation	fines, warning letters,	Practicing Company Secretary, if
			debarment etc.	any.
None				

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

Sr.	Observation of the	Observations made in the	Actions taken by	Comments of the Practicing
No	Practicing	secretarial compliance	the listed entity,	Company Secretary on the
	Company	report for the year ended	if any.	actions taken by the listed
	Secretary in the			entity.
	previous reports			
None				

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DEVENDRA	2.5.4.20-1f4a1018026dfe2bfe04a58577effc2 413b03894ebfd2c978d6b419cdfcc827, postalCode=400067, st=Maharashtra, serialNumber=c05f2d2f33245b79aefb43f02
DIWAN	dff5ac762a490d8869aec77a58d45cb02d476 2c, cn=PRASHANT DEVENDRA DIWAN

CS Prashant Diwan Practicing Company Secretary FCS: 1403 CP: 1979

PR: 530/2017 UDIN: F001403C000353480

Date: 21/05/2021 Place: Mumbai

This report is to be read with our letter of even date which is annexed as **Annexure A** and forms an integral part of this report.



Annexure A

My report of even date is to be read along with this letter.

- 1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
- 2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
- 3. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. My examination was limited to the verification of procedures on test basis.
- 5. The Compliance report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
- 6. I have not carried out the physical verification of any records due to prevailing conditions of COVID 2019 in the country. I have relied on the records as made available by the Company through digital mode as well as I have also relied on the Management representation made by the Company.

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CS Prashant Diwan Practicing Company Secretary FCS: 1403 CP: 1979

PR: 530/2017 UDIN: F001403C000353480

Date: 21/05/2021 Place: Mumbai