



14<sup>th</sup> May, 2021

To,  
The Manager,  
Listing & Compliance,  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400 001.

**Ref: Scrip Code - 506405**

**Sub:** Submission of Annual Secretarial Compliance Report for year ended 31<sup>st</sup> March, 2021.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019; we are submitting herewith Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2021, issued by Mr. Satish Kumar Jain, Proprietor of SKJ & Associates, Practicing Company Secretaries.

You are requested to kindly take the same on your record.

Thanking you,

**For The Dharamsi Morarji Chemical Company Ltd**

**D. T. Gokhale**  
**Sr. Executive Vice President and**  
**Company Secretary**

Encl : As above

**CIN NUMBER: L24110MH1919PLC000564**

**Secretarial compliance report of The Dharamsi Morarji Chemical Company  
Limited for the year ended 31.03.2021**

I, Satish Kumar Jain, Proprietor of SKJ & Associates, Practising Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by M/s The Dharamsi Morarji Chemical Company Limited (“Listed Entity”).
- (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 31<sup>st</sup> 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) 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 Applicable for the period 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 Applicable for the period under review
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable for the period under review
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable for the period under review



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the period under review
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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:-
- As per Regulation 31 (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, 99.84% of the shareholding of promoter(s) and promoter group is in dematerialized form and remaining 0.16% is in process of dematerialization.
- (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 -----				

- (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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
----- NIL -----				

Place: Mumbai  
Date:14.05.2021



For SKJ & Associates  
Company Secretaries

*SJK*

**SATISH KUMAR JAIN**  
Proprietor  
(FCS :6398/PCS:6632)  
UDIN: F006398C000300780