



May 28, 2019

To,

Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.

National Stock Exchange of India Ltd.
Exchange Plaza, Bandra Kurla Complex,
Bandra (E),
Mumbai – 400051.

Dear Sir/Madam,

Sub.: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2019

Ref.: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019

In compliance with the aforementioned SEBI circular, please find attached the Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2019 issued by the Secretarial Auditor of the Company.

Please take the above information on record.

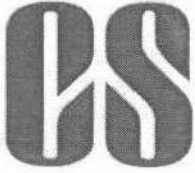
Thanking you,

Yours faithfully,

For **ALKYL AMINES CHEMICALS LTD.**

Chintamani D. Thatte
General Manager (Secretarial) & Company Secretary
& Compliance Officer





P. MEHTA & ASSOCIATES
Practising Company Secretaries

Secretarial compliance report of Alkyl Amines Chemicals Limited for the year ended 31st March, 2019.

I, Prashant S. Mehta, Proprietor of P. Mehta & Associates, Practicing Company Secretaries, have examined:

- a) all the documents and records made available to me and explanation provided by Alkyl Amines Chemicals Limited ("the listed entity") having registered office at Nirman Vyapar Kendra 401-407, Plot no. 10 Sector-17 DBC, Vashi, New Mumbai - 400703,
- 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, 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 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;
- 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) other 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 No	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
Not Applicable			

- 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 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
Not Applicable				

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

Sr No	Observations/Remarks 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	Observations of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For P Mehta & Associates.
Practicing Company Secretaries

Psmehla

Prashant S Mehta
(Proprietor)
ACS No. 5814
C.P. No. 17341



Date: 21st May, 2019
Place: Mumbai