



## Meghmani Finechem Limited

Registered Office : "Meghmani House", B/h. Safal Profitaire, Corporate Road,  
Prahaldnagar, Ahmedabad - 380 015. Gujarat. INDIA. | T : +91 79 2970 9600 / 7176 1000  
E : helpdesk@meghmanifinechem.com | CIN : L24100GJ2007PLC051717

27<sup>th</sup> May, 2023

**National Stock Exchange of India Limited**

"Exchange Plaza",  
Bandra-Kurla Complex,  
Bandra (East) Mumbai 400 051

**BSE Limited**

Floor- 25, P J Tower,  
Dalal Street,  
Mumbai 400 001

**SCRIP CODE: MFL**

**SCRIP CODE: 543332**

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2023.**

We forward herewith the Annual Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2023 provided by Shahs & Associates, Company Secretaries, Ahmedabad dated 20<sup>th</sup> April, 2023.

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

Thanking you,

Yours faithfully,  
**For Meghmani Finechem Limited**

**K. D. Mehta**  
**Company Secretary and Compliance Officer**  
**Membership No. FCS 2051**

*Encl.: As above*



**ANNEXURE "A"**

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF MEGHMANI FINECHEM LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2023**

To,  
The Board of Directors,  
**Meghmani Finechem Limited**  
**Meghmani House, 5th FL+ 6th FL + 7th FL**  
**B/h Safal Profitaire, Prahladnagar,**  
**Satellite, Ahmedabad GJ 380015 IN**

I, **MR. KAUSHIK JAYANTILAL SHAH**, a partner of **SHAHS & ASSOCIATES, COMPANY SECRETARIES**, having its Office at 305, Hrishikesh-II, Near Navrangpura Bus-Stop, Ahmedabad 380 009 have examined:

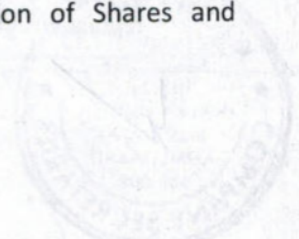
- all the documents and records made available to us and explanation provided including thereon in digital/ electronic mode by Meghmani Finechem Limited, having its office at Meghmani House, 5<sup>th</sup> FL+ 6<sup>th</sup> FL+ 7<sup>th</sup> FL, B/h Safal Profitaire, Prahladnagar, Satellite, Ahmedabad 380 015 ("the listed entity")
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this clarification,

for the year ended **31<sup>st</sup> March, 2023 covering the Audit Period from 01<sup>st</sup> April, 2022 to 31<sup>st</sup> March, 2023** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- 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, including:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- 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 during the Audit Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Audit Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Audit Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the Audit Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016; **(Not Applicable during the Audit Period);**
- (j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009; **(Not Applicable during the Audit Period);**
- (k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018;
- (l) Other regulations as applicable and circulars/ guidelines issued there under;

And based on the above examination, I MR. KAUSHIK JAYANTILAL SHAH, a partner of SHAHS & ASSOCIATES, COMPANY SECRETARIES, during the said review period, the compliance status of the listed entity is appended below;

S N	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS*
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	YES	
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	YES  YES	

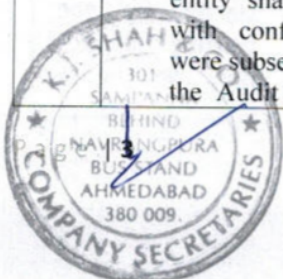




# Shahs & Associates

Company Secretaries

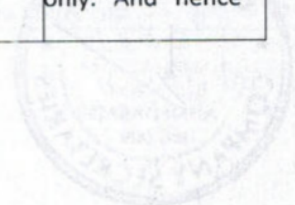
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"><li>• The Listed entity is maintaining a functional website.</li><li>• Timely dissemination of the documents/information under a separate section on the website.</li><li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.</li></ul>	YES YES YES	
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	YES	
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <ul style="list-style-type: none"><li>(a) Identification of material subsidiary companies.</li><li>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</li></ul>	YES YES	
6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	YES	
8.	<p><u>Related Party Transactions:</u></p> <ul style="list-style-type: none"><li>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</li><li>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee</li></ul>	YES YES	



9.	<u>Disclosure of events or information:</u>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.	YES	
10.	<u>Prohibition of Insider Trading:</u>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>  No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	YES	
12.	<u>Additional Non-compliances, if any:</u>  No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	YES	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	The auditor has not resigned in between during financial year ended on 31 <sup>st</sup> March, 2023 and all limited review/ audit report have been signed by the existing auditor only. And hence
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	





	specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		Auditor.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	NA	The Auditor has not resigned in between during the financial year ended on 31 <sup>st</sup> March, 2023 and hence the same is not applicable.

**Meghmani Finechem Limited** has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below: -

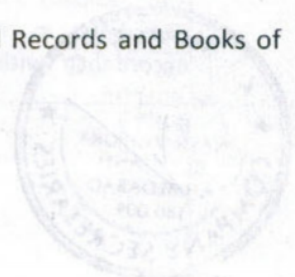
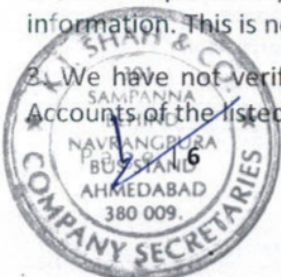
SN	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amt	Observations / Remarks of the Practicing Company Secretary	Mgt. Response	Remarks
<b>Not Applicable</b>										

**Meghmani Finechem Limited** has taken the following actions to comply with the observations made in our previous reports:

SN	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amt	Observations / Remarks of the Practicing Company Secretary	Mgt. Response	Remarks
<b>Not Applicable</b>										

This is further to state that;

1. The Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of our opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.





**Shahs & Associates**

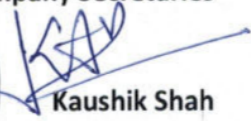
Company Secretaries

4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Ahmedabad

Date: 20<sup>th</sup> April, 2023

For, SHAHS & ASSOCIATES  
Company Secretaries



Kaushik Shah  
Partner  
FCS No 2420 CP No 1414  
UDIN: F002420E000133298  
Peer Review No.833/2020

