

1st July, 2020

DCS – Listing
BSE Limited
1st Floor, New Trading Ring,
Rotunda Building, P.J. Towers,
Dalal Street, Mumbai – 411 001

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Plot No.C/1, G Block,
Bandra Kurla Complex (East), Mumbai – 411 051

Scrip Code - 506655

Scrip Symbol - SUDARSCHEM

Dear Sir,

Sub : Annual Secretarial Compliance Report for the year ended 31st March, 2020

In terms of SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed Annual Secretarial Compliance Report duly issued and signed by Mr. Rajesh Karunakaran, Practicing Company Secretary, Pune, for the year ended 31st March, 2020.

Kindly take the same on record.

Thanking You,
Yours Faithfully,

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED


MANDAR VELANKAR
DGM – LEGAL & COMPANY SECRETARY



Encl : As above

Sudarshan Chemical Industries Limited
Global Head Office :
162 Wellesley Road, Pune - 411 001, India
Tel: +91 20 260 58 888 Fax: +91 20 260 58 222
Email : contact@sudarshan.com
www.sudarshan.com

RAJESH KARUNAKARAN
COMPANY SECRETARY
C.P. NO. 6581, F.C.S NO. 7441

204 Pragati Towers, Opp Shivajinagar S.T. Stand, Shivajinagar, Pune - 411 005,
Tel.No. 020- 3022 4146 -M- 9890320874

Secretarial compliance report of Sudarshan Chemical Industries Limited for the year ended 31st March 2020 – Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

I Rajesh Karunakaran, Proprietor of Rajesh Karunakaran & Co., Company Secretaries, Pune, have examined:

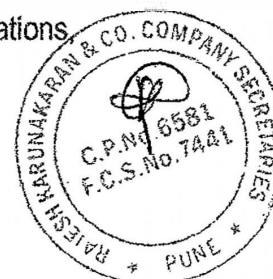
- (a) all the documents and records made available to us and explanation provided by Sudarshan Chemical Industries Limited ("the listed entity / the Company");
- (b) the filings / submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity;
- (d) any other document / filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2020 ("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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (e) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (f) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; 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
Nil			

- (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 eg. Fines, warning letter, debarment etc.	Observations / remarks of the Practicing Company Secretary, if any
Nil				

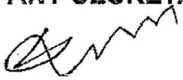
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:-

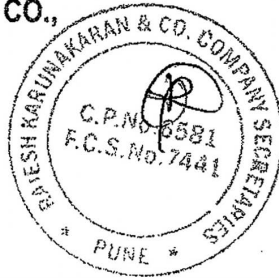
Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Nil				



- (e) The listed entity has complied with the conditions mentioned in 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019, by modifying the terms of re-appointment of the Statutory Auditors of the Company and its Material Subsidiary;

For RAJESH KARUNAKARAN & CO.,
COMPANY SECRETARIES


RAJESH KARUNAKARAN
COMPANY SECRETARY
FCS No. 7441/CP No. 6581



Pune, 22nd June 2020
UDIN-F007441B000395356