

## P. MEHTA & ASSOCIATES

**Practising Company Secretaries** 

## SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015)

## OF Alkyl Amines Chemicals Limited FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2020.

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-17DBC, Vashi, New Mumbai 400703,
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31stMarch, 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
- 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:-

- 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;
- 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;
- 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; 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/Guideline s including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 29(2)/(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	Non- submission of intimation of board meeting regarding declaration of interim dividend within two working days.	The Company has received the notice from stock exchanges regarding delayed compliance with Regulation 29(2)/(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, relating to prior intimation of the board meeting held on 06th February, 2020 in the matter of declaration of interim dividend for financial year 2019-20.

- 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
1	NSE and BSE	Non-Intimation of board meeting regarding declaration of interim dividend within two working days.	Fine of Rs. 10,000 plus GST	The Company has paid the fine amount to both the stock exchanges.



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

Sr No	Observations/Rem arks 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 Applica	able	

For P Mehta & Associates. **Practicing Company Secretaries** 

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

UDIN: A005814B000377317

PRASHANT S. MEHTA **COMPANY SECRETARY** M. NO. 5814 CP. NO. 17341

Date: 24th June, 2020

Place: Mumbai

ACS 5814 CP. NO. 1734