

## Punjab Alkalies & Chemicals Limited

Regd. Office: S.C.O. 125-127, Sector 17-B, Chandigarh - 160 017 (INDIA) Phone: 0172-4072508-569, E- mail: info@punjabalkalies.com Fax: 0172-2704797

CIN: L24119CH1975PLC003607, Website: www.punjabalkalies.com

PACL:SEC:2020: 381

30.06.2020



BSE Limited. 1st Floor, New Trading Ring, Rotunda Building, P.J. Towers, Dalal Street, Fort, MUMBAI-400 001.

Scrip Code No. 506852 (PACL)

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

Dear Sir,

In compliance with SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 8, 2019, please find enclosed copy of Annual Secretarial Compliance Report dated 20.06.2020 issued by M/s A. Arora & Co., Practicing Company Secretary for the financial year 2019-20.

Thanking you,

Yours faithfully, For PUNJAB ALKALIES & CHEMICALS LIMITED

Encl: As above.

AJAY K. ARORA LL.B., FCS, IP GST: 04ADSPA8498H1Z3

A. ARORA & CO.

Company Secretaries

Insolvency Professional

S.C.O. 64-65, 1ST FLOOR, SECTOR 17-A, MADHYA MARG, CHANDIGARH-160 017

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## Secretarial compliance report of Punjab Alkalies and Chemicals Limited for the year ended March 31, 2020

To,

Punjab Alkalies and Chemicals Limited, S.C.O. 125-127, Sector 17-B, Chandigarh.

We, A. Arora & Co. have examined:

- (a) all the documents and records made available to us and explanation provided by **Punjab** Alkalies and Chemicals Limited ("the 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 March 31, 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018: Not applicable as the company has not issued any securities during the financial year 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 as the company has not bought back any of its securities during the financial year under review.

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: Not Applicable as the company has not provided any share based benefits to the employees during the year.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not applicable as the company has not issued any debt securities during the financial vear under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013: Not applicable as the company has not issued any such securities during the financial year under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018

and circulars/ guidelines issued thereunder. Further in terms of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 in respect of Resignation of statutory auditors from listed entities and their material subsidiaries, the listed entity has suitably modified the terms of appointment of the auditors who have already been appointed to give effect to clause 6(A) and 6(B) of the circular.

and based on the above examination, I/We 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	
		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 our 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		Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		N.A.		

Place: Chandigarh Date: 20.06.2020

UDIN: F002191B000359781

For A. Arora & Co.

Ajay K. Arora (Proprietor) FCS No.: 2191

C P No.: 993