



**Secretarial compliance report of Khaitan (India) Limited**  
**(CIN: L10000WB1936PLC008775)**  
**For the year ended 31<sup>st</sup> March, 2021**

I have examined:

- a) all the documents and records made available to me and explanation provided by Khaitan (India) 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, 2021** ("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 (there were no events requiring compliance during the Review Period);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (there were no events requiring compliance during the Review Period);
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (there were no events requiring compliance during the Review Period);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (there were no events requiring compliance during the Review Period);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (there were no events requiring compliance during the Review Period);
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (there were no events requiring compliance during the Review Period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015);

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.
- 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) As on date the trading in equity shares of Khaitan (India) Limited in NSE and BSE is showing status as Temporary Suspended. As informed by the company the reason of temporary suspension is delay in payment of Annual Fees with NSE. However, Management has informed that as on date all Annual Listing fees and other dues has been paid and the company is following up with NSE for removal of suspension. There were no other actions taken against the listed entity/ its promoters/ directors 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 in so far as it appears from my examination of those records.
- d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

**For NISHA MUNKA**  
**Company Secretary**

**Nisha Munka**  
**Practicing Company Secretary**  
  
**Cop No.-18201**

**ACS: 49058**  
**COP: 18201**  
**UDIN: A049058C000475671**

**Place- Kolkata**  
**Date- 16.06.2021**