



100 Years of Sulphur Chemistry

Date: 5<sup>th</sup> June, 2020

To,  
The Manager  
Listing & Compliance  
Bombay Stock Exchange (BSE Limited)  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001.

**SCRIP CODE:506405**

**Sub: Submission of Annual Secretarial Compliance Report for year ended March 31, 2020.**

Dear Sir/ Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2020, issued by M/s SKJ & Associates, Company Secretaries.

Kindly take the same on record.

Thank you.

Yours faithfully

For THE DHARAMSI MORARJI CHEMICAL COMPANY LIMITED

For  
AM

D. T. Golhale  
SR. Executive Vice President &  
Company Secretary



**CIN NUMBER: L24110MH1919PLC000564**

**Secretarial compliance report of The Dharamsi Morarji Chemical Company Limited  
for the year ended 31.03.2020**

I, Satish Kumar Jain, Proprietor of SKJ & Associates, Practising Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by M/s The Dharamsi Morarji Chemical Company Limited ("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 31<sup>st</sup> 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable for the period 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 for the period under review



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable for the period under review
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable for the period under review
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the period under review
- (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 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.
----- 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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
----- NIL -----				



For SKJ & Associates  
Company Secretaries

**SATISH KUMAR JAIN**  
Proprietor

(FCS :6398/PCS:6632)

UDIN: F006398B000318688

Place: Mumbai  
Date:05.06.2020