

#### VARDHMAN ACRYLICS LIMITED

CHANDIGARH ROAD LUDHIANA-141010, PUNJAB T: +91-161-2228943-48 F: +91-0161-2601048, 2220766 E: secretarial.lud@vardhman.com

#### Ref. VAL: SCY: MAY: 2019-20

Dated: 30.05.2019

The National Stock Exchange of India Limited,

"Exchange Plaza", Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai– 400 051, Maharashtra. Fax No.: 022-26598237 and 26598155 Email Id: cmlist@nse.co.in

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2019 under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir(s),

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2019 issued by the Secretarial Auditor of the Company i.e. M/s Ashok K Singla & Associates, Company Secretaries.

Thanking you,

Yours faithfully, For VARDHMAN ACRYLICS LIMITED

BD

ACRY

DHIAN

(Satin Katyal) Company Secretary

Encl: as above

YARNS | FABRICS | THREADS | GARMENTS | FIBRES | STEELS

PAN NO.: AAACV7602E CIN: L51491PB1990PLC019212 WWW.VARDHMAN.COM



## ASHOK K SINGLA & ASSOCIATES

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= COMPANY SECRETARIES =

Regd. Off. : BXX-1374, Krishna Nagar, Near Gurudwara Mai Nand Kaur, Ghumar Mandi, Ludhiana - 141 001. Punjab H.O. : 261, Aggar Nagar Enclave, Barewal Road, Ludhiana-141 012. E-mail : asingla\_cs@yahoo.co.in aksingla1000@gmail.com

Ref. No. SECRETARIAL COMPLIANCE REPORT OF VARDHMAN ACRYLICS LIMITED FOR THE YEAR ENDED 31.03.2019

To The Board of Directors, Vardhman Acrylics Ltd.

We Ashok K Singla & Associates, Company Secretaries, have examined:-

- (a) all the documents and records made available to us and explanation provided by VARDHMAN ACRYLICS LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) an y other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2019("Review Period") in respect of compliance with the provisions of :

- (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- (ii) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI")

The specific regulations, whose provisions and the circulars/ guidelines issued there under, 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, 2009/2018;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;





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Ref. No.

Date : .....

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and other regulations as applicable and circulars/ guidelines issued thereunder;

and

based on the above examination, 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.<br>No | Compliance Requirement<br>(Regulations/ circulars<br>/guidelines including specific<br>clause) | Deviations | Observations/ Remarks of<br>the Practicing Company<br>Secretary |
|-----------|--|------------|---|
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(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:

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Ref. No.

| Sr.<br>No | Action taken Details of<br>by violation |      | Details of action<br>taken E.g. fines<br>warning letter<br>debarment, etc | of the Practicing<br>Company Secretary, if |
|-----------|---|------|---|--|
| -         |   | 1000 | NIL   |  |

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

| Sr.<br>No | Observations of<br>the Practicing<br>Company<br>Secretary in the<br>previous reports | Observations made<br>in the secretarial<br>Compliance report<br>for the year<br>ended | Actions<br>taken by<br>the listed<br>entity, if<br>any | Comments of the<br>Practicing Company<br>Secretary on the<br>actions taken by the<br>listed entity |
|-----------|--|---|--|--|
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for Ashok K Singla & Associates Company Secretaries

SH CP No.1942 (Ashok K Singla PHIA FCS No.: 2004

CP No.:1942

Place: Ludhiana Date: 06.05.2019