

VARDHMAN ACRYLICS LIMITED

CHANDIGARH ROAD LUDHIANA-141010, PUNJAB

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F: +91-0161-2601048, 2220766

E: secretarial.lud@vardhman.com

Ref. VAL: SCY: JUNE: 2020-21

Dated: 24.06.2020

The National Stock Exchange of India Limited, "Exchange Plaza", Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai- 400 051, Maharashtra. Scrip code: VARDHACRLC

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March, 2020 under Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir(s),

Pursuant to Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report for the year ended 31st March, 2020 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

(Satin Katyal)

Company Secretary



(M): 78140 - 02345 (M): 93572 - 03395 (R): 0161-2553115

ASHOK K SINGLA & ASSOCIATES

= 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.

aksingla1000@gmail.com E-mail: asingla_cs@yahoo.co.in

Ref. No.

Date	*	
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SECRETARIAL COMPLIANCE REPORT OF VARDHMAN ACRYLICS LIMITED FOR THE YEAR ENDED 31.03.2020

To, The Board of Directors Vardhman Acrylics Limited

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 exchange,
- (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:

- (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;

CP No.1942

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits)
 Regulations, 2014;
- 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:-

1	Sr. No	Compliance Requirement (Regulations/ circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		N	I.A.	

- (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.
			N.A.	







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Ref. No.

Date:

(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	Actions taken by the listed entity, if any	Practicing Company Secretary on the actions taken by the listed entity
		N.A.		

UDIN: FOO2004 B000 35 6281

for Ashok K Singla & Associates Company Secretaries CP No.1942

> (Ashok Singla) FCS No.:2004

CP No.:1942

Place: Ludhiana