

May 27, 2021

To,  
Department of Corporate Relationships  
BSE Limited,  
25, P. J. Towers,  
Dalal Street,  
Mumbai – 400 001.

**Scrip Code: 500120**

Sub: Submission of Annual Secretarial Compliance Report for the year ended on March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

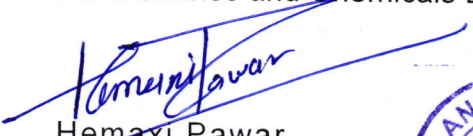
Dear Sir / Ma'am,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019; please find enclosed copy of Annual Secretarial Compliance Report dated May 18, 2021 issued by Sandip Sheth & Associates, Practicing Company Secretaries for the Financial Year 2020-21.

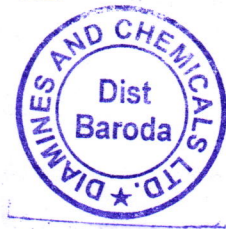
Kindly take the above mentioned information on records.

Thanking You,

Yours Faithfully,  
For Diamines and Chemicals Limited

  
Hemaxi Pawar  
Company Secretary

Encl. As above





*Sandip Sheth & Associates  
Company Secretaries*

To,  
The Board of Directors,  
Diamines And Chemicals Limited  
Plot No. 13, PCC Area,  
P.O. Petrochemicals,  
Vadodara - 391346, Gujarat.

Dear Sir/s,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21**

We have been engaged by Diamines And Chemicals Limited (hereinafter referred to as 'the listed entity') bearing CIN: L24110GJ1976PLC002905 whose equity shares are listed on BSE Limited (BSE) (Security Code 500120) to conduct an audit in terms of Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue Annual Secretarial Compliance Report thereon.





It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively. Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue report thereon. Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involves such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report for the period 2020-21 is enclosed herewith as Annexure-A.

**For, Sandip Sheth & Associates**  
*Company Secretaries*  
**Firm Unique Code: P2001GJ041000**  
**UDIN: F005467C000340076**  
SHETH SANDIP  
ANILKUMAR  
**Sandip Sheth**  
*Partner*  
FCS: 5467  
CP No.: 4354

Date: 18<sup>th</sup> May, 2021  
Place: Ahmedabad

**Add: 518, Anand Mangal-III, Opp. Core House, Rajnagar Club Lane, Ambawadi, AHMEDABAD-6.**

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**ANNUAL SECRETARIAL COMPLIANCE REPORT**  
**of Diamines And Chemicals Limited for the year ended 31<sup>st</sup> March, 2021**  
[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, Sandip Sheth And Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by *Diamines 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 31<sup>st</sup> March, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories And Participants) Regulations, 2018

and circulars/guidelines issued thereunder, whereas we further report that there were no actions/events reported by the listed entity during the period under review for the following SEBI Regulations;



- (a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;  
(b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;  
(c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;  
(d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;  
(e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

We hereby report based on the above examination 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:-

<i>Sr. No</i>	<i>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/Remarks of Practicing Company Secretary</i>
<i>None</i>			

- (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:

<i>Sr No.</i>	<i>Action Taken By</i>	<i>Details of Violation</i>	<i>Details of action taken eg., fines, warning letter, debarment etc.,</i>	<i>Observations/remarks of Practicing Company Secretary, if any</i>
<i>None</i>				

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



*Sandip Sheth & Associates  
Company Secretaries*

<i>Sr No.</i>	<i>Observation of Practicing Company in the Previous Report</i>	<i>Observations made in Secretarial Compliance Report for the year ended....(The years are to be mentioned)</i>	<i>Action taken by the listed entity, if any</i>	<i>Comments of Practicing Company Secretary on the actions taken by listed entity</i>
<i>None</i>				

**For, Sandip Sheth & Associates**  
*Company Secretaries*

*Firm Unique Code: P2001GJ041000*

*UDIN: F005467C000340076*

**SHETH SANDIP ANILKUMAR**

**Sandip Sheth**

*Partner*

FCS: 5467

CP No.: 4354

Date: 18<sup>th</sup> May, 2021

Place: Ahmedabad



**Add: 518, Anand Mangal-III, Opp. Core House, Rajnagar Club Lane, Ambawadi, AHMEDABAD-6.**

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