

SSPK & CO. COMPANY SECRETARIES

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Secretarial Compliance Report

of LORDS CHLORO ALKALI LIMITED for the year ended
31st March, 2021

I/We have examined:

- (a) all the documents and records made available to us and explanation provided by **Lords Chloro Alkali 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 31st 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, wherever applicable, 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 during 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 during the period under review;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- not applicable during the period under review;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- not applicable during 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 during the period under review;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (I) The Depositories Act, 1996;
- (J) Securities and Exchange Board of India(Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003;
- (K) other Act, Regulations, rules and guidelines, as amended from time to time, issued thereunder by the Securities and Exchange Board of India applicable to the Companyand circulars/ guidelines issued thereunder;

and based on the above examination, I/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:-

S. NO.	COMPLIANCE REQUIREMENT (REGULATIONS/ CIRCULAR/ GUIDELINES INCLUDING SPECIFIC CLAUSE)	DEVIATIONS	OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY (PCS)
1	Reg. 33 (3) of SEBI (LODR) read with SEBI circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/140 dated July 29, 2020.: Company was required to submit financial results for quarter ending June, 2020 to Stock Exchange by September 15, 2020.	The Company submitted financial results for quarter ending June, 2020 to Stock Exchange on September 17, 2020.	As informed by the management of the Company to us and intimated to BSE Ltd, as well due to exposure of Covid infection to one of the employees of the Company and consequent sanitisation of entire office, the Board Meeting of the Company for approval of



			Un-audited financial results for quarter ending 30th June, 2020 scheduled on 15th September, 2020 (being last date post extension by SEBI) was adjourned by 2 days and held on 17th September, 2020.
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- (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/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.
1	BSE Ltd.	Delay of 2 days in submission of financial results for quarter ending June, 2020 pursuant to Reg. 33 (3) of SEBI (LODR) read with SEBI circular no. SEBI/HO/CF D/CMD1/CIR/ P/2020/140 dated July 29, 2020.:	Fine of Rs. 10,000/- was imposed by the BSE Ltd.	The Company has duly paid the fine and has also intimated to BSE Ltd, that due to exposure of Covid infection to one of the employee of the Company and consequent sanitisation of entire office, the Board Meeting of the Company for approval of Un-audited financial results for quarter ending 30th June, 2020 scheduled on 15th September, 2020 (being last date post extension by SEBI) was adjourned by 2 days and held on 17th September, 2020.

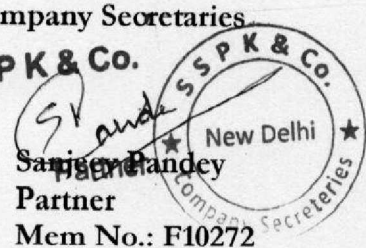


- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Place : Delhi
Date : 28.06.2021

For SSPK & Co.
Company Secretaries
For **SSPK & Co.**
Sanjeev Pandey
Partner
Mem No.: F10272
COP No : 17237



UDIN No.: F010272C000530968