

HVS & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF ARCHEAN CHEMICAL INDUSTRIES LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022

ISIN: INE128X07028

We, HVS & Associates, Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by ARCHEAN CHEMICAL INDUSTRIES LIMITED (CIN: U24298TN2009PLC072270) (formerly known as Arcean Chemical Industries Private Limited) (hereinafter referred as "the listed entity") having its Registered office at No.2, North Crescent Road, T. Nagar, Chennai – 600 017;
- b) the filings/ submissions made by the listed entity to the stock exchanges;
- c) website of the listed entity, (website address: <https://www.arceanchemicals.com>)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2022 ("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 thereunder; and
 - ii. 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 during the year under review)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable during the year under review)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the year under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

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E-mail ID : chennai@hvsassociates.in, Tel : 044 - 35001081 / 82 GSTIN : 33AAJFH2289R1ZP

Branch Office : New No. 35/113A, (Old No. 35/253), 1st Floor, Ram Nivas, Thrikkakara, Ernakulam - 682 021.

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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable during the year under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; **(Not applicable as the Company is not registered as Registrar to an Issue and Share Transfer Agent during the year under review);**
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (k) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021

And based on the above examination, we hereby report that, during the period under review:

- (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/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 19 of SEBI LODR Regulations, 2015	The nomination and remuneration committee is formed. . As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.
2.	Regulation 20 of SEBI LODR Regulations, 2015	The Listed Entity's Stakeholder Relationship Committee (SRC) is formed. . As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.

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3.	Regulation 21 of SEBI LODR Regulations, 2015	The Listed Entity's Risk Management Committee (RMC) is formed. As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.
4.	Regulation 23 of SEBI LODR Regulations, 2015	The Listed Entity has obtained the approvals from Board of Directors for all Related Party Transactions (RPT) for the year under review. As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.
5.	Regulation 25 of SEBI LODR Regulations, 2015	As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.
6.	Regulation 27 of SEBI LODR Regulations, 2015	As per Regulation 15 (1A), the Compliance becomes mandatory from 1 st April 2023.	As per the explanation given by the Company, the Company shall be complying with the Regulation by the mandatory applicable date.
7.	Regulation 50(1) of SEBI (LODR) Regulations, 2015	The listed entity has not given prior intimation to the stock exchange about the Board Meeting held on 18 th February 2022, where the fund raised by way of issuance of non-convertible securities was approved	As per the explanation given by the Company, the Company shall comply with the Regulation.

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8.	Regulation 51(1) of SEBI (LODR) Regulations, 2015	The Listed Entity has not informed the stock exchange regarding the price sensitive information with respect to approval for issue of non-convertible securities.	As per the explanation given by the Company, the Company shall comply with the Regulation.
9.	Regulation 52(1) and 52(2) of SEBI (LODR) Regulations, 2015	The listed entity has submitted the quarterly unaudited financial statement for the half yearly ended September 2021 and quarterly ended December 2021, to the Stock Exchange after the specified period.	The Listed Entity has filed the results belatedly for the half year ended 30 th September 2021 on 27 th December 2021 and quarter ended 31 st December 2021 on 11 th May 2022
10.	Regulation 57(4) of SEBI (LODR) Regulations, 2015	The listed entity has submitted the details with a delay for the non-convertible securities for which interest/dividend was payable for the quarter ended December, 2021.	The Company has filed on 7 th January 2022 and explained that the delay is due to inadvertence.
11.	Regulation 57(5) of SEBI (LODR) Regulations, 2015	The listed entity has not submitted the certificate for payment of interest for the quarter ended September, 2021.	Due to inadvertence the Company has not submitted and has thereafter complied with the Regulation from the next quarter.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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 there under:

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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	Observation 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
Not Applicable				

For HVS & Associates
Company Secretaries
Firm Unique Code: P2016TN048300
Peer Review No: 641/2019



VINU THOMAS
M.No: 10306 , CoP:13428
UDIN: F010306D000412840

Place: Chennai
Date: 27/05/2022