

**KRA & ASSOCIATES
PRACTICING COMPANY SECRETARIES**

PARTNERS

OS R.KANNAN

OS AISHWARYA

SRI SANKARA GURUKRIPA ILLAM

Regd OFF. : No. 6A, 10th Street,

New Colony, Adambakkam,

Chennai - 600 088

E -mail : gkrkgram@yahoo.in

Ph: 044 - 4355 9396

**SECRETARIAL COMPLIANCE REPORT of
TUTICORIN AKALI CHEMICALS AND FERTILIZERS LIMITED
for the year ended 31st March, 2021**

We have examined:

- a) All the documents and records made available to us and explanation provided by TUTICORIN ALKALI CHEMICALS AND FERTILIZERS LIMITED ("the Listed Entity")
- b) The filings/submissions made by the listed entity to the Stock Exchanges,
- c) Website of the listed entity.

Any other document/filing, as may be relevant, which has been relied upon to make this certification for the year ended 31st March 2021 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") and the 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

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 as on 31.03.2021.



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Sr. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1	Reg. 38 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Listed Entity shall maintain a minimum public shareholding of 25%	During the year the company through OFS, achieved the MPS of 25%. They have done so within 1 year of approval. There is a discrepancy in the approval date which is in discussion with BSE.

(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 my examination of those records.

(c) The following actions were 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
1	BSE Limited	Non-compliance with the minimum public shareholding norms.	BSE levied a fine of Rs. 27,43,500/- (inclusive of GST) with its presumed approval date.	The Company has written to BSE explaining that there has been no delay in compliance and has requested them to waive off the fine. Further reply from BSE is being awaited.



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

Sr. No.	Observations made in the Secretarial Compliance report for the year ended 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NIL	NIL	NIL

Note: We have conducted online verification & examination of records, as facilitated by the Company, due to COVID-19 and lockdown situation prevailing in Chennai

FOR KRA & ASSOCIATES



(R. KANNAN)

SR. PARTNER

CP. NO. 3363

UDIN: F006718C000527392



DATE: 28.06.2021

PLACE: CHENNAI