

Ref: NACL/SE/2021-22

10th June, 2021

1) BSE Limited

Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai, Maharashtra,
MUMBAI - 400001.

Company Code: 524709

2) National Stock Exchange of India Ltd

Exchange Plaza, 5th Floor,
Plot No.C/1 G Block,
Bandra- Kurla Complex, Bandra(E),
MUMBAI - 400051.

Script ID: NACLIND

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report for the year ended 31st March, 2021 issued by Mr.K.V.Chalama Reddy, Practising Company Secretary, Hyderabad.

You are requested to take the above information on record.

Thanking you,

for **NACL Industries Limited**



Satish Kumar Subudhi

Company Secretary & Head-Legal



K. V. CHALAMA REDDY

B.Sc., LL.B., F.C.S.,
COMPANY SECRETARY
M.No.: F 9268, C.P.No.5451

Plot No. 8-2-603/23/3 & 8-2-603/23, 15,
02nd Floor, HSR Summit, Banjara Hills,
Road No. 10, Hyderabad -500034
Ph: 9848014503
[e-mail: kvcr133@gmail.com](mailto:kvcr133@gmail.com)

To,

The Board of Directors

NACL Industries Limited

Plot No.12-A, "C"- Block, Lakshmi towers, No.8-2-248/1/7/78, Nagarjuna Hills, Panjagutta,
Hyderabad - 500082

Sir/ Madam,

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

I have been engaged by **NACL Industries Limited** (hereinafter referred to as 'the Company') bearing CIN: L24219TG1986PLC016607 whose equity shares are listed on National Stock Exchange of India Limited (NSE) (Symbol: **NACLIND**) and BSE Limited (BSE) (Security Code: 524709) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the 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 a 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 involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance

Report is enclosed.

KAMBHAM
VENKATA
CHALAMA REDDY

K.V.CHALAMA REDDY

Practicing Company Secretary

Membership No: F9268, C.P.No.:5451

Date : 10.06.2020

Place : Hyderabad



K. V. CHALAMA REDDY

B.Sc., LL.B., F.C.S.,
COMPANY SECRETARY
M.No.: F 9268, C.P.No.5451

Plot No. 8-2-603/23/3 & 8-2-603/23, 15,
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Annual Secretarial compliance report of NACL INDUSTRIES LIMITED for the year ended 31st March .2021

I, K.V.Chalama Reddy, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by **NACL INDUSTRIES 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, 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;
- (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;

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) regulations, 2019: *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) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009: *Not applicable during the period under review*
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018: *to the extent applicable*

and based on the above examination, I 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:-

<i>Sr.No</i>	<i>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
	<i>Nil</i>	<i>Nil</i>	<i>Nil</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 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

<i>Sr.No.</i>	<i>Action taken by</i>	<i>Details of violation</i>	<i>Details of action taken</i>	<i>Observations/ Remarks of the Practicing Company Secretary, if any</i>
	<i>Nil</i>	<i>Nil</i>	<i>Nil</i>	<i>Nil</i>

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

<i>Sr.No</i>	<i>Observations of the Practicing Company Secretary in the previous reports</i>	<i>Observations made in the secretarial compalince report for the year ended</i>	<i>Action taken by the listed entity ,if any</i>	<i>Comments of the Practicing Company Secretary on the actions taken by the listed entity</i>
<i>Not applicable during period under review</i>				

(e) The listed entity has complied with the points 6(A) and 6(8) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/A19 dated October 18, 2019 with regard to the Resignation of Statutory Auditors: There has been no resignation of Statutory Auditors in FY 2020-21.

KAMBHAM
VENKATA
CHALAMA
REDDY



K.V. CHALAMA REDDY
Practicing Company Secretary
Membership No: F9268, C.P.No.:5451

Date : 10.06.2021

Place : Hyderabad

UDIN number : F009268C000440919