



## SIRCA PAINTS INDIA LIMITED

(Formerly known as Sircolor Wood Coatings Pvt. Ltd.)

Regd. office : Plot No-50, Badli Industrial Area, Phase-2, New Delhi-110042

Ph.: 011-42083083 / 47533213 Email : info@sircapaints.com Web.: www.sircapaints.com

CIN NO : L24219DL2006PLC145092

**TO,**

**LISTING DEPARTMENT**

NATIONAL STOCK EXCHANGE OF INDIA LTD.

EXCHANGE PLAZA , 5TH FLOOR, PLOT NO. C/1

G-BLOCK, BANDRA-KURLA COMPLEX, BANDRA (E)

MUMBAI – 400051.

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31<sup>ST</sup> 2021.**

**REF: SYMBOL-SIRCA**

Dear Sir/Madam,

In terms of **Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015** and SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8<sup>th</sup> 2019, please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31<sup>st</sup>, 2021.

Kindly take the above information on your record and oblige.

Thanking you,

**Yours faithfully,**

**For Sirca Paints India Limited**

**(Formerly Known as Sircolor Wood Coatings Private Limited)**

For SIRCA PAINTS INDIA LIMITED  
(Formerly Known as Sircolor Wood Coatings Pvt. Ltd.)  
  
Company Secretary

**Chahat Mahajan**

**Company secretary & Compliance officer**

**Membership No: 51255**

**Dated: 30/04/2021**

**Place: Delhi**

***Encl: As above***



**Secretarial compliance report of SIRCA PAINTS INDIA LIMITED for the year ended 31.03.2021**

I, **Karan Khurana**, Proprietor of M/S **Karan Khurana & Associates**, Company Secretaries in practice, have examined:

- a) all the documents and records made available to us and explanation provided by **SIRCA PAINTS INDIA 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 **March 31, 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 (Share Based Employee Benefits) Regulations, 2014; (**Not applicable to the company during the review period**)
- e) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not applicable to the company during the review period**)
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not applicable to the company during the review period**)
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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,
- 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.	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

- 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				

**For Karan Khurana & Associates**

Karan Khurana



FCS No.: 10893  
C P No.: 15397  
UDIN: F010893C000212248

Date: 30.04.2021  
Place: New Delhi