

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

☎ **011-42083083 / 47533213**

✉ **info@sircapaints.com** 🌐 **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, 2020.

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 8th, 2019, please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31, 2020.

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: 05/06/2020

Place: Delhi

Encl: As above



Secretarial Compliance Report of SIRCA PAINTS INDIA LIMITED for the financial year ended 31st March, 2020

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 **SICRA 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 on **31st March, 2020** (“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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), Rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 to the company during the period under review.



(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not applicable to the company during the period under review.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not applicable to the company 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 to the company 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 (Depositories and Participants) Regulations, 2018.

and based on the above examination, 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 there under, as applicable, except in respect of matters specified below:-

S. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines including specifies clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NONE			

(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 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:

S. No.	Action taken by	Details of violations	Details of action taken E.g., fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any
None				

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

S. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2019	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

For on the behalf of
M/s Karan Khurana & Associates



Karan Khurana
ACS: 39746
UDIN: A039746B000317353

Dated: 04.06.2020