CORPORATE : KANGANWAL ROAD, V.P.O. JUGIANA,
OFFICE : G.T. ROAD, LUDHIANA-141 120 (INDIA)
PBX : PHONE : 00-91-161 4692500 (30 Lines)
: MKTG.: 2511713, 2511813
FAX : 00-91-161-2510084
VISIT US : www.gargltd.com
CIN : L74999DL1983PLC017001

GARG ACRYLICS LTD.
THREE STAR EXPORT HOUSE

GAL/2023-24 Date: 27th May, 2023

The Head- Listing & Compliance,
Metropolitan Stock Exchange of India Limited,
Vibgyor Towers, 4th floor, Plot No C 62, G - Block,
Opp. Trident Hotel, Bandra Kurla Complex, Bandra (E),
Mumbai – 400098, India.

Sub: Secretarial Compliance Report of the Company, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the financial year ended 31.03.2023.

Dear Sir,

Please find enclosed herewith a copy of Secretarial Compliance Report of the Company issued by Company Secretary in practice, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015, as amended read with SEBI circular no. CIRlCFD/CMDIl127/2019 dated February 08, 2019, for the financial year ended 31.03.2023.

This is for your kind information and record.

Thanking You,
Yours Faithfully,
For GARG ACRYLICS LIMITED

Priya Rani
Digitally signed by Priya Rani
Date: 2023.05.27 17:14:33 +05'30'

Priya Rani
Company Secretary

R. K. LOOMBA & ASSOCIATES
COMPANY SECRETARIES

CS Rajesh Kumar Loomba
MA (Eco), FCS

Phone : 0161 - 4611319
Cell : 92165 - 10901
E-mail : loombarajesh@yahoo.co.in
rajeshloomba@gmail.com

Secretarial Compliance Report of Garg Acrylics Limited

for the financial year ended 31.03.2023

To
The Board of Directors
Garg Acrylics Limited
A-50/1 Wazirpur, Industrial Area,
Delhi-110052

I Rajesh Kumar Loomba practicing Company Secretary have examined:

(a) all the documents and records made available to us and explanation provided by **Garg Acrylics Limited** ("the company"),

(b) the filings/ submissions made by the company to the stock exchanges,

(c) website of the company,

(d) other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2023 ("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 were not applicable to the company during the review period;

(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 were not applicable to the company during the review period;

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 were not applicable to the company during the review period;

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R.K. LOOMBA & ASSOCIATES Company Secretaries C.P. No. 4320 FCS No. 3359 LUDHIANA

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 were not applicable to the company during the review period;

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 were not applicable to the company during the review period;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

I hereby report that, during the Review Period the compliance status of the company is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	**Secretarial Standards:** The compliances of the company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	yes	-
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations areadopted with the approval of board of directors ofthe company. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelinesissued by SEBI	yes	-
3.	**Maintenance and disclosures on Website:** • The company is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website	yes	-
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualifiedunder Section 164 of Companies Act, 2013as confirmedby the company.	yes	-

UDIN: 003359E000396488

R.K. LOOMBA & ASSOCIATES
Company Secretaries
C.P. No. 4029
FCS No. 3359
LUDHIANA

5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA	The company Does not have any material subsidiary
6.	**Preservation of Documents:** The company is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	yes	-
7.	**Performance Evaluation:** The company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	yes	-
8.	**Related Party Transactions:** (a) The company has obtained prior approval of Audit Committee for all related party transactions; or (b) The company has provided detailed reasons along with confirmation whether the transactions were subsequently approved /ratified /rejected by the Audit Committee, in case no prior approval has been obtained.	NA	The company has not entered into any transaction with any Related Party
9.	**Disclosure of events or information:** The company has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	yes	-
10.	**Prohibition of Insider Trading:** The company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	yes	-
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has been taken against the company/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	yes	-

UDIN: 003359E000396488

R.K. LOOMBA & ASSOCIATES
Company Secretaries
C.P. No. 4029
FCS No. 3359
LUDHIANA

12.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	**Only 99.14% of promoters shareholding is in demat form. Whereas as per Reg. 31(2) of SEBI LODR Reg. 2015. The company is required to maintain 100% shareholding of promoters and promoter group in demat form.**

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	**Compliances with the following conditions while appointing/re-appointing an auditor**		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditorbefore such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from theend of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation has issued the limited review/ audit Report for the last quarter of such financial year as well as the audit report for such financial year.	NA	The Auditors were reappointed in Annual General Meeting of the company in accordance with the provisions of the Companies Act 2013. No resignation was made by the Auditor.

2.	**Other conditions relating to resignation of statutory auditor** i. Reporting of concerns by Auditor with respect to the company/its material subsidiary to the AuditCommittee: a. In case of any concern with the management of the company/material subsidiary such as non-availability of information / non- cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the company and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by themanagement, as applicable. c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor. ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the company/ its material subsidiary has not provided information asrequired by the auditor.	NA	No resignation was made by the Auditors

UDIN: 003359E000396488

R.K. LOOMBA & ASSOCIATES Company Secretaries C.P. No. 4029 FCS No. 3359 LUDHIANA

3.	The company / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No resignation was made by the Auditor

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

(a) The company has complied with the provisions of the above regulations and circulars/guidelines issued thereunder except inrespect of matters as specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/guide lines including specific clause)	Regu-lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Mgt. Re-sponse	Remarks
NIL										

(b) The company was not required to take any action with regard to compliance with the observation made in previous reports as the same was not applicable.

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regu-lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Mgt. Re-sponse	Re-marks
NOT APPLICABLE										

For R K Loomba & Associates
Company Secretaries

Rajesh Kumar Loomba
Prop
Fcs 3359
CP No 4029
PRNo 2502/2022
UDIN: 003359E000396488

Place Ludhiana
Date 27.05.2023

UDIN: 003359E000396488