

**Secretarial Compliance Report**

for the Financial Year ended March 31, 2021

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, Samdani Shah & Kabra, Company Secretaries, have examined (a) all the documents and records made available to us and explanation provided by **Gujarat Fluorochemicals Limited** having CIN: L24304GJ2018PLC105479 ("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 Financial Year ended March 31, 2021 ("Review Period") in respect of compliance with provisions of the:

- A. Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued there under; and
- B. 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 and the Circulars / Guidelines issued there under, have been examined for the review period, include: -

- a. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, however, the same were not applicable;
- c. SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d. SEBI (Buyback of Securities) Regulations, 2018, however, the same were not applicable;
- e. SEBI (Share Based Employee Benefits) Regulations, 2014, however, the same were not applicable;
- f. SEBI (Issue and Listing of Debt Securities) Regulations, 2008, however, the same were not applicable;
- g. SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013, however, the same were not applicable;
- h. SEBI (Prohibition of Insider Trading) Regulations, 2015;
- i. SEBI (Depositories and Participants) Regulations, 2018;
- j. SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- k. SEBI (Debenture Trustees) Regulations, 1993, however, the same were not applicable.

The Listed Entity has also complied with various Circulars / Guidelines issued under above Regulations, including Clauses 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019; and based on the above examination, we hereby report that, during the Review Period:

- i. The Listed Entity has complied with the provisions of the above Regulations and Circulars / Guidelines issued there under, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / Circulars / Guidelines / including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
Nil			

- ii. 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.
- iii. 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. Fines, Warning Letter, Debarment, etc	Observations of the Practicing Company Secretary, if any.
Nil				

- iv. 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 previous reports	Observations made in the Secretarial Compliance Report for the year ended March 31, 2020	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity.
Nil				

  
**S. Samdani**  
Partner  
**Samdani Shah & Kabra**  
Company Secretaries  
ICSI Peer Review UIN: P2008GJ016300  
FCS No.: 3677; CP No.: 2863



**UDIN: F003677C000493155**

Place: Vadodara, Date: June 21, 2021