



SHALIMAR
PAINTS

May 27, 2022

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring,
Rotunda Building, P.J. Towers,
Dalal Street, Fort, Mumbai - 400 001
BSE Scrip Code: 509874

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No. C/1, G- Block
Bandra Kurla Complex, Bandra (E),
Mumbai - 400051
NSE Symbol : SHALPAINTS

Sub: Secretarial Compliance Report for the financial year ended March 31, 2022

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Secretarial Compliance Report of Shalimar Paints Limited for the financial year ended March 31, 2022 duly issued by M/s. NSP & Associates, Practising Company Secretaries and Secretarial Auditors of the Company.

You are requested to kindly take the above information on record.

Thanking you,

Yours faithfully,

For Shalimar Paints Limited

Shikha Rastogi
Company Secretary



Encl.: As above



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PAINTS

Shalimar Paints Ltd.

Corporate Office: 1st Floor, Plot No. 28, Sector 32, Gurugram - 122001, Haryana

Regd. Office: Stainless Centre, 4th Floor, Plot No. 50, Sector 32, Gurugram - 122001, Haryana.

Call: +91 124 461 6600 Fax: +91 124 461 6659 Toll Free: 1800-103-6509

Email Id: askus@shalimarpaints.com Website: www.shalimarpaints.com CIN: L24222HR1902PLC065611



NSP & Associates

Practicing Company Secretaries

Plot No-14, Rajbagh Colony, Sahibabad,
Ghaziabad, Uttar Pradesh 201005

+91-9990756359

info@corpsmith.org

**Secretarial Compliance Report of Shalimar Paints Ltd.
for the financial year ended on 31st March, 2022**

I, Naveen Shree Pandey, Proprietor of NSP & Associates, have examined:

- a) all the documents and records made available to me and explanation provided by Shalimar Paints Ltd. (CIN: L24222HR1902PLC065611) ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document(s)/ filing(s), as may be relevant, which has been relied upon to make this certification

for the year ended 31st March, 2022 ("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 (Buy - Back 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 (up to 12th August, 2021) and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- 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) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client;
- j) The 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 COVID-19 pandemic, 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:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non-submission of the statement on shareholder complaints for quarter ended December 31, 2021 with BSE within the prescribed time period	The Company had made the required filing on February 14, 2022 and had requested for waiver of fine imposed by BSE. Refer Para (c)(1) below for details.

- 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 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
1.	BSE Limited	Non-submission of the statement on shareholder complaints for quarter ended December 31, 2021 with BSE within the prescribed time period under Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	BSE vide email dated February 14, 2022 imposed a fine of Rs. 22,000/-	The Company had made the required filing with BSE on February 14, 2022. The Company had requested for waiver of fine imposed by BSE as Nil Investors Complaint Report was submitted by the Company on NEAPS on January 18, 2021, however, the filing of NIL complaints was inadvertently missed in the Compliance module on BSE due to technical and other issues. Pending such request, the Company had paid the fine with BSE.

- d) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.



- e) The listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular.

For NSP & Associates
Company Secretaries

For NSP AND ASSOCIATES

N.S. Pandey
Proprietor Naveen Shree Pandey
(Proprietor)
FCS No.: 9028
C P No.: 10937
UDIN: F009028D000404874

Place: Noida
Date: 27th May, 2022