

UNIVERSAL STARCH-CHEM ALLIED LTD.

Mhatre Pen Building, 'B' Wing, 2nd Floor, Senapati Bapat Marg, Dadar (West), Mumbai - 400 028.
Tel.: 6656 3333, 2436 2210 • Fax:022-2432 7436 • Gram:GROWMAIZE • E-mail:mumbai@universalstarch.com

CIN : L24110MH1973PLC016247



Date :

Date : 25th June, 2020

To
The Corporate Relationship Department
Bombay Stock Exchange,
Phiroze Jeejeebhoy Tower,
Dalal Street, Mumbai- 400 001.

Sub: Annual Secretarial Compliance Report for the F.Y 2019-20.

Ref: - Code No. 524408

Dear Sir,

In compliance of SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2020 issued by M/s. Leena Agrawal & Co, (Practicing Company Secretary).

Kindly take the above on your records and acknowledge the receipt of the same.

Thanking you,

**Yours faithfully,
For Universal Starch Chem Allied Limited**

**Sd/-
Chaitali Salgaonkar
Company Secretary & Compliance Officer**

Encl: A/a

Tel.: 2431 4881 / 2431 4882

Fax : 2436 3312

E-mail : leenaagrawal06@gmail.com

LEENA AGRAWAL
F.C.A., A.C.A., D.I.S.A. (ICA)

**SECRETARIAL COMPLIANCE REPORT OF UNIVERSAL STARCH CHEM ALLIED LIMITED
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2020**

*[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the
purpose of compliance with Regulation 24A of SEBI (Listing Obligations and
Disclosure Requirements) Regulations, 2015]*

To,
Board of Directors,
Universal Starch Chem Allied Limited
CIN: L24110MH1973PLC016247
B Wing, 2nd Floor, Mhatre Pen Building,
Senapati Bapat Marg,
Dadar West,
Mumbai 400028.

I Leena Harshal Agrawal, Company Secretary in whole time practice, have examined:

- a) all the documents and records made available to us and explanation provided by Universal Starch Chem Allied 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, 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 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;

- not applicable for the period under review

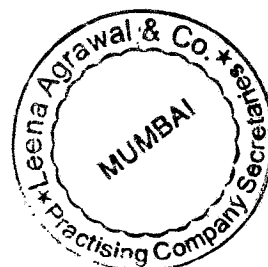
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- not applicable for the period under review
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- not applicable for the period under review
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **- not applicable for the period under review**
- g) Securities and Exchange Board of India (Issue and Listing of Nonconvertible and Redeemable Preference Shares) Regulations, 2013;
- not applicable for the period under review
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) SEBI (Depositories and Participants) Regulations, 2018 erstwhile SEBI (Depositories and Participants) Regulations, 1996;
- j) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- k) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
- not applicable for the period under review

and based on the above examination, 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
Nil			

- 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:



A handwritten signature in black ink.

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.
Not Applicable				

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 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
Not Applicable				

Note:

This report is based on the following: -

- A. Data received from the Company partially through electronic mode as physical verification of the data and corresponding documents from the month of March 2020 could not be accessed during the course of audit due to the ongoing nationwide lockdown on account of COVID-19 pandemic.
- B. Compliances required to be done by the Company during the Financial Year ended March 31, 2020 (i.e. the period covered for the purpose of this Report is from April 1, 2019 to March 31, 2020)

Place: Mumbai

Date: 19/06/2020

ICSI UDIN: F006607B000369761



For Leena Agrawal & Co.

Practising Company Secretary

Leena

Leena Harshal Agrawal
Proprietress
FCS No.: 6607
CP No.: 7030