

May 23, 2025

<b>The National Stock Exchange of India Ltd.</b> Listing Department Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051  <b>Company Symbol: DMCC</b>	<b>BSE Limited</b> Department of Corporate Services Floor 25, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001  <b>Scrip Code : 506405</b>
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**Subject:** Submission of Annual Secretarial Compliance Report for the financial year 2024-25 .

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015, as amended, please find enclosed herewith Annual Secretarial Compliance Report dated May 23, 2025 issued by Mr. Satish Kumar Jain, Proprietor of SKJ & Associates (FCS:6398, C. P. No. 6632) practicing Company Secretaries and Secretarial Auditor of the Company for the financial year 2024-25.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

**For DMCC Speciality Chemicals Limited**  
(Formerly known as The Dharamsi Morarji Chemical Company Limited)

**Sonal Naik**  
**Company Secretary & Compliance Officer**  
**ICSI Membership No. ACS 43179**

**Encl:** As Above

**DMCC SPECIALITY CHEMICALS LIMITED**  
(Formerly known as "The Dharamsi Morarji Chemical Company Limited")

**REGD. OFFICE:** Prospect Chambers, 317/21 Dr. D.N. Road, Fort, Mumbai 400001, India.  
**T:** +9122 2204 8881-2-3, **E:** info@dmcc.com, **W:** www.dmcc.com  
**CIN NUMBER:** L24110MH1919PLC000564

**Secretarial compliance report of DMCC SPECIALITY CHEMICALS LIMITED**  
(Formerly known as The Dharamsi Morarji Chemical Company Limited) **for the year**  
**ended 31.03.2025**

To  
The Board of Directors  
DMCC SPECIALITY CHEMICALS LIMITED  
(Formerly known as THE DHARAMSI MORARJI CHEMICAL COMPANY LIMITED)  
Prospect Chambers, D. N. Road,  
Mumbai - 400 001.

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s DMCC SPECIALITY CHEMICALS LIMITED (Formerly known as The Dharamsi Morarji Chemical Company Limited) ("Listed Entity") (hereinafter referred as 'the listed entity'), having its Registered Office at Prospect Chambers, D. N. Road, Mumbai - 400 001. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, Satish Kumar Jain, Proprietor of SKJ & Associates, Practising Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by M/s **DMCC SPECIALITY CHEMICALS LIMITED** (Formerly known as The Dharamsi Morarji Chemical Company Limited) ("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 31<sup>st</sup> March, 2025 ("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 and Sweat Equity) Regulations, 2021; Not Applicable for the period under review
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; Not Applicable for the period under review
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/guidelines issued thereunder; 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 thereunder except in the matter as specified below:**

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines included)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification / Fine/ Show Cause)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
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ng specifi c clause)				Notice / Warni ng, etc.)			tary		
NONE									

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

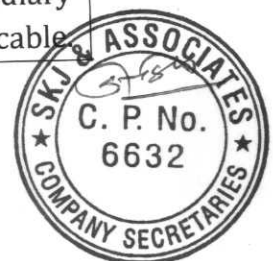
S. N o.	Compli ance Requir ement (Regul ations/ circula rs/ guideli nes includi ng specifi c clause)	Regu latio n/ Circu lar No.	Devi atio ns	Actio n Take n by	Type of Action (Advis ory/ Clarifi cation / Fine/ Show Cause Notice / Warni ng, etc.)	Det ails of Viola tion	Fine Am oun t	Obser vation s/ Remar ks of the Practic ing Compa ny Secret ary	Manag ement Respon se	Re ma rks
None										

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under Section	Yes	



	118(10) of the Companies Act, 2013 and mandatorily applicable.			
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/circulars /guidelines issued by SEBI</li> </ul>	Yes		
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>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</li> </ul>	Yes		
4.	<b>Disqualification of Director:</b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes		
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as</p>	(a) NA  (b) Yes		The Company does not have any material subsidiary. Hence, identification of material subsidiary is Not Applicable



	other subsidiaries			However, Company has made disclosure related to other subsidiary.
6.	<b>Preservation of Documents:</b> The listed entity 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.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the year as prescribed in SEBI Regulations.	Yes		
8.	<b>Related Party Transactions:</b> <b>(a)</b> The listed entity has obtained prior approval of Audit Committee for all related party transactions; or <b>(b)</b> In case of no prior approval, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	(a) Yes  (b) NA		(b) The listed entity has obtained prior approval of Audit Committee for all related party transactions
9.	<b>Disclosure of events or information:</b> The listed entity 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		It is Observed that the Company should disclose its ongoing tax litigations/ disputes in Integrated Corporate Governance Report as per



			SEBI/HO/CFD /PoD2/CIR/P/0155 and SEBI/HO/CFD /CFD-PoD-2/CIR /P/2024/185 even if there are no updates.
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been taken against the listed entity/ 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 The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR	NA	Not Applicable as there was no change in the Auditors during the reporting period





	Regulations by listed entities.		
13.	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	

**Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



**For SKJ & Associates  
Company Secretaries**

*(Signature)*

**SATISH KUMAR JAIN  
Proprietor**

**(FCS :6398/PCS:6632)**

**UDIN: F006398G000421661**

**Place: Mumbai  
Date:23.05.2025**