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BHANDARI & ASSOCIATES
COMPANY SECRETARIES

Secretarial Compliance Report of Reliance Chemotex Industries Limited
for the financial year ended March 31, 2026

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, Bhandari & Associates, Company Secretaries have examined:

a) all the documents and records made available to us and explanation provided by **Reliance Chemotex Industries 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 report,

for the financial year ended **March 31, 2026** ('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) the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ['the Listing Regulations'];
b) the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018#;
c) the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
d) the Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018#;
e) the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021#;
f) the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021#;
g) the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
h) the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025#;
i) the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021#;
j) the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and and circulars/ guidelines issued thereunder;



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[#] *The Regulations or Guidelines, as the case may be were not applicable to the listed entity for the Review Period.*

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 respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by*	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary ('PCS')	Management Response	Remarks
1.	The listed entity shall fill the vacancy in the office of the Compliance Officer within three months from the date of vacancy.	Regulation 6 of the Listing Regulations	Delay in filling the vacancy of Company Secretary and Compliance Officer.	National Stock Exchange ('NSE') and BSE Limited ('BSE')	Fine	The listed entity has appointed its Chief Financial Officer ('CFO') as the Company Secretary and Compliance Officer on May 22, 2025 in a delay of 7 days.	Fine of Rs. 8,260/- by NSE and BSE, each.	None	The Company had identified a suitable candidate for the position of Company Secretary and Compliance Officer; however, the formal appointment was delayed due to the non-availability of certain Board members required for convening the meeting. The Company has since streamlined its	None

									internal approval and scheduling processes and will ensure that such delays do not recur in the future.	
2.	The listed entity shall disclose to the stock exchanges change in the directors of the Company within 12 hours from the occurrence of the event in case the event or information is emanating within the listed entity.	Regulation 30 read with Schedule III of the Listing Regulations and SEBI Master circular no. HO/49/14/14 (7)2025-CFD-POD2/I/3762 /2026 dated January 30, 2026.	Delay in submission of intimation pertaining to re-appointment of an Independent Director.	None	None	The listed entity had approved the re-appointment of Mr. Ram Niwas Sharma as an Independent Director for second term w.e.f. February 10, 2026. However, the disclosure for the same was intimated to the stock exchanges on March 27, 2026 which was beyond 12 hours from the date of his re-appointment.	None	None	The delay in filing was inadvertent and occurred due to internal administrative reasons. However, we will ensure that such delays do not recur in the future.	None
3.	The listed entity shall disclose to the stock exchanges the resignation of Senior Managerial Personnel	Regulation 30 read with Schedule III of the Listing Regulations and SEBI Master circular no. HO/49/14/14	Delay in submission of intimation pertaining to the resignation of SMP.	NSE	A clarification pertaining to the delay in disclos	Mr. Birendra Bahadur Singh ('SMP') had resigned w.e.f. the closing of business hours of February 07, 2026. However, the intimation for	None	None	The Company received the resignation letter on Saturday, which is a non-working day. Accordingly, the disclosure was promptly	None

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	('SMP') within 24 hours from the occurrence of the event.	(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026.			ure of resign ation of SMP was sought by NSE.	the same was made on February 09, 2026 which was beyond 24 hours from his resignation.			uploaded on the following working day, i.e., Monday. The Company will ensure timely compliance and avoid such delays in the future.	
4.	The listed entity shall disclose to the stock exchanges all events or information which are material and in any case not later than thirty minutes from the closure of the meeting of the board of directors in which the decision pertaining to the event or information has been taken.	Regulation 30 read with Schedule III of the Listing Regulations and SEBI Master circular no. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024.	Delay in disclosure of financial results for the financial year ended on March 31, 2025.	BSE	A clarific ation pertain ing to the delay in disclos ure of financi al result. was sought by BSE.	The listed entity had approved the audited financial results for the financial year ended March 31, 2025 in its Board Meeting held on May 30, 2025. The meeting was concluded at 12:55 PM and disclosure for the same was intimated at 1:43 PM to BSE and at 1:47 PM to NSE which was beyond 30 minutes from the conclusion of the board meeting.	None	None	One of the agenda items forming part of the outcome was duly filed within the prescribed 30 minutes timeline. However, the filing of the audited financial results was delayed due to certain technical and procedural issues encountered at the time of submission. The delay was inadvertent and was subsequently accepted by the Stock Exchanges. The Company has	None

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									since strengthened its internal processes to ensure that such delays do not occur in the future.	
5.	The listed entity shall submit the certificate issued by the depository participant ('DP') to the stock exchange within 15 days of receipt.	Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018.	Delay in submission to the stock exchanges.	None	None	The listed entity has obtained a certificate under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018 on April 07, 2025 and the same was submitted to the stock exchanges on April 29, 2025 which was beyond 15 days of receipt of the said certificate.	None	None	The delay occurred due to internal procedural oversight and was inadvertent in nature. The same has been noted and necessary steps have been taken to ensure timely submission going forward.	None
6.	Listed entities shall publicize the opening of special window for re-lodgement of transfer deeds of physical securities through various media including print	SEBI circular no. SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/97 dated July 02, 2025 and circular no. HO/38/13/11(2)2026-	Non-publication of opening of special window for re-lodgement of transfer deeds of physical shares on bi-monthly basis and	None	None	The listed entity has not published newspaper advertisement pertaining to opening of special window for re-lodgement of transfer deeds of physical shares neither submitted the action taken	None	None	The Company had published the details of the Special Window on its website and a considerable number of shareholders availed the benefit of the facility.	None

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	and social media, on a bi-monthly basis during the six-month period. Further, Listed Entities shall also provide reports on publicity and shares re-lodged for transfer cum demat in the format specified by SEBI on monthly basis.	MIRSD-POD/I/3750/ 2026 dated January 30, 2026.	non-submission of the action taken report to SEBI.			report to the SEBI during the period under review.			However, the newspaper advertisement and the Action Taken Report were inadvertently not submitted during the review period. The Company is taking corrective steps and will ensure full compliance with the applicable requirements going forward.	

** During the Review Period, the stock exchanges sought certain clarifications apart from the abovementioned in relation to the submissions made by the listed entity, which were duly addressed.*

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

Sr. No.	Observations/ Remarks of the PCS in the previous reports	Observations made in the secretarial compliance report for the year ended	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Details of violation/deviations and actions taken/penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
Not Applicable						

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c) We hereby report that, during the Review Period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observations / Remarks by PCS
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India.	Yes	-
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity. • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars /guidelines issued by SEBI.	Yes	-
3.	Maintenance and disclosures on Website: • The listed entity 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) of Listing Regulations are accurate and specific which redirects to the relevant document(s)/ section of the website.	Yes	-
4.	Disqualification of Director: None of the Directors of the listed entity are disqualified under Section 164 of the Companies Act, 2013.	Yes	-

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5.	Details related to Subsidiaries of listed entity: (a) Identification of material subsidiary companies; (b) Requirements with respect to disclosure of material as well as other subsidiaries.	Yes	The listed entity does not have any subsidiary company.
6.	Preservation of Documents: 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 Listing Regulations.	Yes	-
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in Listing Regulations.	Yes	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes	-
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of Listing Regulations within the time limits prescribed thereunder.	Yes, refer 'Remark' column	The listed entity has complied with the required disclosure(s) under Regulation 30 along with Schedule III of the Listing Regulations within the prescribed timelines except as stated in table (a) above.



10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes, refer 'Remark' column	The listed entity has complied with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 except as stated in Sr. No. 13 below.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No actions 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.	Yes, refer 'Remark' column	The fine was levied by NSE and BSE under Regulation 6 of the Listing Regulations as stated in Table (a) above.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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 Listing Regulations by listed entities.	NA	There was no resignation of statutory auditor from the listed entity during the Review Period. Further, the listed entity does not have any material subsidiary company.
13.	No Additional non-compliances observed: No Additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes, refer 'Remark' column	During the Review Period, certain discrepancies were identified in relation to the maintenance and updation of the structured digital database, including promptly recording of unpublished price sensitive information entries. Further, the listed entity is in the process of updating the complete details of designated persons and their immediate relatives/connected persons and ensuring compliance in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015.

We further report that the disclosure requirements pertaining to Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the Listing Regulations read with SEBI master circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 last updated on January 30, 2026 is not applicable to the listed entity.



Assumption and 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 report 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 Listing Regulations 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 **Bhandari & Associates**
Company Secretaries
Unique Identification No.: P1981MH043700
Peer Review Certificate No.: 6157/2024

Saurabh Somani

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Saurabh Somani
Partner
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Mumbai | May 29, 2026
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