



**SURABHI AGRAWAL**

**PRACTICING COMPANY SECRETARY**

Office No. 56, 4<sup>th</sup> Floor, Dawa Bazaar, R.N.T. Marg, Indore (M.P.) - 452001  
pcs.surabhiagrawal@gmail.com +91-9993977785

**SECRETARIAL COMPLIANCE REPORT  
OF  
CHOKSI LABORATORIES LIMITED (CINL85195MP1993PLC007471)  
FOR THE YEAR ENDED MARCH 31, 2023**

I, CS Surabhi Agrawal, Practicing Company Secretary, Indore have examined:

- a) all the documents and records made available to us and explanation provided **CHOKSI LABORATORIES LIMITED** (“the listed entity”) having CIN: **L85195MP1993PLC007471**,
- 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 clarification,

For the year ended **March 31, 2023** (“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 (Regulations) 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 as the Company has not bought back any of its securities during the year 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 as the Company has not bought back any of its securities during the year under review.**
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - **Not Applicable as the Company has not bought back any of its securities during the year under review.**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, **Not Applicable as the Company has not bought back any of its securities during the year under review.**



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- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **Not Applicable as the Company has not bought back any of its securities during the year under review.**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 as amended from time to time. **Not applicable as the Company has not bought back any of its securities during the year under review.**
- k) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investments and External Commercial Borrowings and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that, during the Review Period:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks
1	Secretarial Standard The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	YES	
2	Adoption and timely updation of the Policies: <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 has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li></ul>	YES	
3	Maintenance and disclosures on Website: <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</li></ul>	YES	





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	specific which redirects to the relevant document(s)/ section of the website		
4	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	YES	
5	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	
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 <b>SEBI LODR Regulations, 2015</b>	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 SEBI 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 SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI(Prohibition of Insider Trading) Regulations, 2015	YES	



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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	NA	
12	With reference to Regulation 3(5) and 3(6) of SEBI (PIT) Regulations, 2015 which required SDD to be maintained by the company, in this regard, companies are required to submit a quarterly compliance certificate certified either by the compliance officer or a Practicing Company Secretary (PCS), as a Standard Operating Process under SEBI (PIT) Regulations.	YES	
13	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		

Additional columns have been inserted in the format of ASCR which is provided below:

- (a) 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: –

S N O	Compliance Requirement (Regulations/circulars/guidelines Including specific clause)	Regulation/ Circular No.	Action Taken by	Type of Action Advisory / Clarification/ Fine/Show Cause Notice/ Warning, etc.	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management-Response	Remark
NOT APPLICABLE									

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



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NOT APPLICABLE									

**Note:-**

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Mr. Raghendra Singh (DIN: 08459665) was appointed as Independent Director with effect from August 13, 2022  
Mr. Mayank Pandey (DIN: 00039170) was resigned from the post of Director with effect from July 09, 2022.

Ms. Himika Choksi (DIN: 00155007) was reappointed as Whole Time Director by the Company's board of Directors in their meeting on February 12, 2022, effective from April 01, 2022. The necessary filings of e-form MGT-14 and e-form MR-1 were filed. Additionally, during the AGM held on September 24, 2022, members consented to the reappointment of Himika Choksi (DIN: 00155007) as Whole Time Director, and the filing of e-form DIR-12 was filed.



**Date: May 26, 2023**  
**Place: Indore**

**Surabhi Agrawal & Associates**  
**Practicing Company Secretary**  
**ACS: 56574; C.P. No: 23696**  
**Peer Review No.-1999/2022**  
**UDIN: A056574E000386411**