



May 30, 2022

National Stock Exchange of India Limited, Listing Compliance Department Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (East) Mumbai – 400 051 Scrip Symbol: GALAXYSURF	BSE Limited, Listing Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 Scrip Code: 540935
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Sub: Submission of Annual Secretarial Compliance Report.

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019 of SEBI.

Dear Sir/Madam,

With reference to captioned regulation and circular, we are hereby submitting Annual Secretarial Compliance Report provided by M/s S.N. Ananthasubramanian & Co., Practicing Company Secretaries for the year ended March 31, 2022.

Kindly take this declaration on your record.

Yours faithfully,

For Galaxy Surfactants Limited

Niranjan Ketkar

Company Secretary

M. No. A20002

Encl: as above

Communication Address:

Rupa Solitaire,
Ground Floor, Unit no. 8, 12A and 14
Millennium Business Park, Mahape,
Navi Mumbai, 400 710
Ph: +91-22-33063700

Regd. Office: C-49/2, TTC Industrial Area,
Pawne, Navi Mumbai-400 703, India
CIN: L39877MH1986PLC039877
Ph: +91-22-27616666
Fax : +91-22-27615883/ 27615886
e-mail : galaxy@galaxysurfactants.com
Website: www.galaxysurfactants.com



S. N. ANANTHASUBRAMANIAN & CO
Company Secretaries

10/25-26, 2nd Floor, Brindaban,
Thane (W) – 400 601
T: +91 22 25345648 | +91 22 25432704
E: snaco@snaco.net | W: www.snaco.net
ICSI Unique Code: P1991MH040400

To,
The Board of Directors,
Galaxy Surfactants Limited
CIN: L39877MH1986PLC039877
C-49/2, TTC, Industrial Area, Pawne,
Navi Mumbai – 400703.

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2021-22

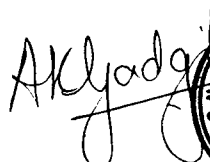

We have been engaged by **Galaxy Surfactants Limited** (hereinafter referred to as 'the Company') bearing CIN: **L39877MH1986PLC039877** whose equity shares are listed on National Stock Exchange of India Limited (NSE) (Symbol: GALAXYSURF) and BSE Limited (BSE) (Security Code: 540935) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.

Aparna Gadgil
Partner
ACS: 14713 | COP No.: 8430
17th May, 2022 | Thane



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Company Secretaries

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**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
GALAXY SURFACTANTS LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022**

We have examined:

- (a) all the documents and records made available to us and explanations provided by **Galaxy Surfactants Limited** ('the listed entity');
- (b) 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 financial 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ('SCRA'), rules made there under and the Regulations, circulars, guidelines issued there under 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 ("LODR") ;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – **Not Applicable as there was no reportable event during the financial 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 there was no reportable event during the financial year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12th August, 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021);– **Not Applicable as there was no reportable event during the financial year under review;**





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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to 15th August, 2021) – **Not Applicable as there was no reportable event during the financial year under review;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (up to 15th August, 2021) – **Not Applicable as there was no reportable event during the financial year under review;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August, 2021- **Not Applicable as the Company has not issued and listed any Non-convertible securities**

and circulars/ guidelines issued there under;

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 there under, 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.	<p>Reg 30 (6) of LODR Read along with point no 4 of Clause A of part A of Schedule III</p> <p>Outcome of the meeting of Board Of Directors: The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:</p> <p>(a) dividends recommended (h) Financial Results</p>	<p>The Board Meeting held on 8th June 2021 to approve the Financial Results for Year ended 31st March 2021 and to recommend Final Dividend concluded at 4.25 p.m.</p> <p>The outcome relating to the aforesaid was intimated to NSE at 5.04 p.m. and BSE at 5.05 p.m with a delay of 9 and 10 minutes respectively beyond prescribed time of 30 minutes.</p>	<p>The Company has informed that the delay in filing was due to slow response of stock exchange portals at the time of submission of said information and the Company has not received any further communication from the exchanges in this regard.</p>





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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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 there under – **None**
- (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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company had, as required under R Eg 13(3) of LODR filed statement of investor complaints for the quarter ended 31st December 2020 to the National Stock Exchange of India Limited (NSE) on 22 nd January 2021, with a delay of one day, for which NSE had served a notice indicating the delay in submission vide email dated, 16 th February 2021 and imposed a fine of Rs 1180/- .	2020-21	The Company had responded to NSE on 18th February 2021 that it could not submit the Statement within prescribed time due to a technical glitch, which later was submitted once the technical glitch was resolved by NSE.	NSE considered the submission and reversed the said fine levied vide its letter dated 17 th March 2022. The matter stands resolved.
2.	While the results for the year ended 31st March 2020	2020-21	Not Applicable	The Company has made the disclosures of Related Party Transactions to BSE





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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	were published on 25th June 2020, the Company inadvertently missed to make the Disclosure of Related Party Transactions required to be made pursuant to Reg 23(9) of LODR to BSE Ltd . Later the said disclosure was made on 11th February 2021 after delay of 6 months.			Ltd and NSE required to be made during the FY 2021-22 within prescribed time.

For S. N. ANANTHASUBRAMANIAN & Co.
Company Secretaries

ICSI Unique Code: P1991MH040400

Peer Review Cert. No.: 606/2019

Aparna Gadgil
Partner

ACS: 14713 | COP No.: 8430

ICSI UDIN : A014713D000330908

17th May, 2022 | Thane

