

May 23, 2024

National Stock Exchange of India Limited, Listing Compliance Department Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (East) Mumbai – 400 051 <b>Scrip Symbol: GALAXYSURF</b>	BSE Limited, Listing Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 <b>Scrip Code: 540935</b>
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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, 2024.

Kindly take this declaration on your record.

Yours faithfully,  
**For Galaxy Surfactants Limited**

**Niranjan Ketkar**  
Company Secretary

Encl: as above

**Communication Address:**

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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](mailto:galaxy@galaxysurfactants.com)  
Website: [www.galaxysurfactants.com](http://www.galaxysurfactants.com)



**S. N. ANANTHASUBRAMANIAN & CO**  
**Company Secretaries**

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E: [snaco@snaco.net](mailto:snaco@snaco.net) | W: [www.snaco.net](http://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 2023-24**

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 (Symbol: GALAXYSURF) and BSE Limited (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 Master Circular SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 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.

For S. N. ANANTHASUBRAMANIAN & Co.

Company Secretaries

ICSI Unique Code: P1991MH040400

Peer Review Cert. No.: 5218/2023

S. N. Viswanathan

Partner

ACS: 61955 | COP No. 24335

ICSI UDIN: A061955F000408611

21<sup>st</sup> May, 2024 | Thane





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**ANNUAL SECRETARIAL COMPLIANCE REPORT OF GALAXY SURFACTANTS  
LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

We have examined:

- (a) all the documents and records made available to us and explanations provided by **GALAXY SURFACTANTS LIMITED** ('the Company');
- (b) filings/ submissions made by the Company to the stock exchanges;
- (c) website of the Company;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

**for the financial year ended 31<sup>st</sup> March, 2024** ('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 there under, 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 there was no reportable event during the review period;**
- (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 review period.**







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- (e) The Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021 – **Not Applicable as there was no reportable event during the review period;**
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 – **Not Applicable as there was no reportable event during the review period;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under;

and based on the above examination, we hereby report that, during the review period:

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (b) The Company has taken the actions to comply with the observations made in previous reports – **Not applicable.**
- (c) We hereby report that, during the review period the compliance status of the Company with the requirements is as mentioned in **Annexure – A** to the report.

**For S. N. ANANTHASUBRAMANIAN & Co.**

**Company Secretaries**

**ICSI Unique Code: P1991MH040400**

**Peer Review Cert. No.: 5218/2023**

*S. N. Viswanathan*

**S. N. Viswanathan**

**Partner**

**ACS: 61955 | COP No. 24335**

**ICSI UDIN: A061955F000408611**

**21<sup>st</sup> May, 2024 | Thane**





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**Annexure – A**

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS
1)	<b>Secretarial Standard</b> The compliances of the Company 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 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
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 Company.</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	None
3)	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>• The Company 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.	None.





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Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS
4)	<b>Disqualification of Director:</b> None of the Directors of the Company is/are disqualified under Section 164 of Companies Act, 2013, as confirmed by the Company	Yes	None
5)	<b>Details related to Subsidiaries of the Company have been examined w.r.t.</b> a) Identification of material subsidiary companies b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	None
6)	<b>Preservation of Documents:</b> The Company 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	None
7)	<b>Performance Evaluation:</b> The Company has conducted performance evaluation of the Board, <u>Independent</u> Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8)	<b>Related Party Transactions:</b> a) The Company has obtained prior approval of Audit Committee for all Related party transactions, or b) The Company has provided detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit committee, in case no prior approval has been obtained	Yes  Not applicable	None  No reportable event







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Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS
9)	<b>Disclosure of events or information:</b> The Company 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	None
10)	<b>Prohibition of Insider Trading:</b> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11)	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No Actions taken against the Company/ 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	None
12)	<b>Resignation of statutory auditors from the Company or its material subsidiaries</b> In case of resignation of statutory auditor from the Company or any of its material subsidiaries during the financial year, the Company 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 Regulations by the Company.	Not Applicable, as no reportable event during the review period.	None  



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Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS
13)	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	Yes	None

For S. N. ANANTHASUBRAMANIAN & Co.  
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