



UNICHEM
LABORATORIES LTD.

May 23, 2025

BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001.

National Stock Exchange of India Ltd.
Exchange Plaza, Bandra Kurla Complex,
Bandra (East),
Mumbai – 400 051.

BSE Scrip Code – 506690

NSE Symbol – UNICHEMLAB

Dear Sir,

Subject: - Submission of Annual Secretarial Compliance Report for year ended 31st March 2025 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), 2015 [‘Listing Regulations’]

With reference to the above, please find enclosed herewith Annual Secretarial Compliance Report for year ended 31st March 2025 issued by M/s. Alwyn Jay & Co., Practicing Company Secretaries pursuant to Regulation 24A of the Listing Regulations. This is for your information and record.

Thanking you,

Yours faithfully,

For UNICHEM LABORATORIES LIMITED



PRADEEP BHANDARI

Head – Legal & Company Secretary

Encl.: a/a

Alwyn Jay & Co. Company Secretaries

[Firm Registration No: P2010MH021500] [Peer Review Certificate No.5936/2024]

Annex-103, Dimple Arcade, Asha Nagar, Kandivali (East), Mumbai 400101.

Branch Office: B-002, Gr. Floor, Shreepati-2, Royal Complex, Behind Olympia Tower, Mira Road (E), Thane-401107 ; Tel: 022-79629822 ; Mob: 09820465195; 09819334743

Email : alwyn@alwynjay.com Website: www.alwynjay.com

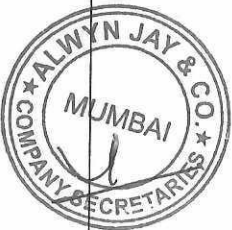
Secretarial compliance report of Unichem Laboratories Limited (CIN: L99999MH1962PLC012451) for the year ended 31st March, 2025

We have examined:

- (a) all the documents and records made available to us and explanation provided by Unichem Laboratories Limited (hereinafter called "the Company"),
- (b) the fillings/submissions made by the Company to the stock exchanges,
- (c) Website of the Company.
- (d) any other documents/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2025 ("Review Period") in respect of compliance with 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 Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circular, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI").

The specific Regulations, as amended from time to time, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2015.
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulation 2018.
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation 2011.
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable to the Company.**
- (e) 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 - **Not Applicable to the company.**
- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client – **Not Applicable to the company.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation 2015.
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021- **Not applicable to the company.**
- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.



And circulars/guidelines issued thereunder.

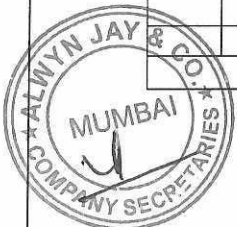
and based on the above examination, we hereby report that during the Review Period:

- (a) The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder including except in respect of the 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 | Management Response | Remarks |
|----------------|---|--------------------------|------------|-----------------|---|----------------------|-------------|---|---------------------|---------|
| | | | | | Advisory/ Clarification/ Fine/Show Cause Notice/ Warning etc. | | | | | |
| | | | | | | | | | | |
| Not Applicable | | | | | | | | | | |

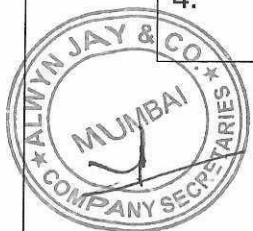
- (b) The Company has taken the following actions to comply with the observation made in previous reports:

| Sr. No. | Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports) | Observations made in the Secretarial Compliance report for the year ended 31 st March, 2024 (The years are to be mentioned) | 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 | | | | | | |



Further, we hereby confirm the following for the Review Period:

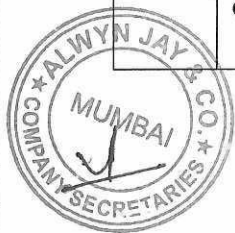
| Sr. No. | Particulars | Compliance (Yes/No/NA) | Status | Observations/Remarks by PCS |
|---------|---|------------------------|--------|-----------------------------|
| 1. | <u>Secretarial Standard:</u> <ul style="list-style-type: none"> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI). | Yes | | Not Applicable |
| 2. | <u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company. 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 | | Not Applicable |
| 3. | <u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> The Company 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) are accurate and specific which redirects to the relevant document(s)/ section of the website. | Yes | | Not Applicable |
| 4. | <u>Disqualification of Director:</u> None of the Director of the Company are disqualified under | Yes | | Not Applicable |



| | | | |
|----|---|-----|----------------|
| | Section 164 of Companies Act, 2013. | | |
| 5. | <u>To examine details related to Subsidiaries of the Company:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries. | Yes | Not Applicable |
| 6. | <u>Preservation of Documents:</u> 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 | Not Applicable |
| 7. | <u>Performance Evaluation:</u> The Company has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations. | Yes | Not Applicable |
| 8. | <u>Related Party Transactions:</u> (a) The Company has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee. | Yes | Not Applicable |
| 9. | <u>Disclosure of events or information:</u> The Company has provided all the required disclosure(s) under | Yes | Not Applicable |



| | | | |
|-----|---|----------------|----------------|
| | Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder. | | |
| 10. | <u>Prohibition of Insider Trading:</u> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. | Yes | Not Applicable |
| 11. | <u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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 | Not Applicable | Not Applicable |
| 12. | Resignation of statutory auditors from the Company or its material subsidiaries: 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 | Not Applicable |
| 13. | <u>Additional non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc. | Not Applicable | Not Applicable |



We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations.

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 Company.
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 Company.
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 Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place : Mumbai

Date : 22nd May, 2025



Office Address :

Annex-103, Dimple Arcade,
Asha Nagar, Kandivali (East),
Mumbai 400101.

ALWYN JAY & Co.

Company Secretaries

[Jay D'Souza FCS.3058]

(Partner)

[Certificate of Practice No.6915]

[UDIN : F003058G000411059]