



Wealth from Waste

Alufluoride Ltd.

Mulagada, Mindi, Visakhapatnam 530 012, India
+91 891 254 8567 | Contact@alufluoride.com
www.alufluoride.com
CIN – L24110AP1984PLC005096

Date: 30th May, 2024

To
The Corporate Relationship Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai 400 001.
Scrip Code: 524634

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the period ended 31st March, 2024.

In terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report for the period ended 31st March, 2024 issued by Practicing Company Secretary.

Kindly take the same on record.

Yours Faithfully,
For **Alufluoride Limited**

Vaishali Kohli
Company Secretary and Compliance Officer
Membership No.: ACS 63818

Encl.: a/a



**Secretarial compliance report of M/s. ALUFLUORIDE LIMITED for the
financial year ended 31.03.2024
(Regulation 24A of SEBI LODR, Regulations, 2015)**

We GMVDR & Associates have examined:

- a) all the documents and records made available to us and explanation provided by M/s. ALUFLUORIDE 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 certification,

for the year ended 31.03.2024 ("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 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) 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 to the Company during the 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 to the Company during the Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the Company during the Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
and circulars/ guidelines issued thereunder;

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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 | Management Response | Remarks |
|--------|---|--------------------------|--|-----------------|------------------|--|-------------|--|--|---------|
| 1 | Regulation.23(9) of the SEBI (LODR) Regulations, 2015 | Reg.23 (9) | Delay in submission of Disclosure of Related Party Transactions with Stock Exchange for the quarter /half year ended 30.09.2023. | BSE | SOP fine imposed | Violation of Regulation.23(9) of the SEBI (LODR) Regulations, 2015 | 5000 | The company has paid SOP fine /penalty imposed by BSE. | The delay was due to technical issue at BSE filing portal. | Nil |
| 2 | Regulation.46 & 62 of the SEBI (LODR) Regulations, 2015 | 46 & 62 | Delay in submission of information required under Reg.42 & 62 of SEBI LODR | Nil | Nil | Delay in submission of information required under Reg.42 & 62 of SEBI LODR | Nil | The Company has submitted the required information to BSE. | Will ensure timely compliance in future | Nil |

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

| Sr.No | Observations/ Remarks of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31.03.2023 | 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 |
|-------|---|--|---|---|---|--|
| 1 | Non-compliance with Regulation.31 of the SEBI (LODR) Regulations, 2015: Based on the submission made by the company, BSE has withdrawn the fine imposed under SEBI LODR. | Non-compliance with Regulation.31 of the SEBI (LODR) Regulations, 2015 | Filing of Shareholding pattern for the quarter ended 30.09.2022 on or before 21 days from the end of relevant quarter. | The Company has not submitted the shareholding pattern for the quarter ended 30.09.2022 within the due date. | Based on the submission made by the company, BSE has withdrawn the fine imposed under SEBI LODR | Nil |
| 2 | Reg.55A of the SEBI (DP) Regulations, 1996: The Company has not submitted the Reconciliation of Share Capital Audit Report for the quarter ended 30.06.2022 within the due date. | Non compliance with Reg.55A of the SEBI (DP) Regulations, 1996 | Filing of Reconciliation of Share Capital Audit Report for the quarter ended 30.06.2022 under Regulation.55A of the SEBI (DP) Regulations, 1996 | The Company has not submitted the Reconciliation of Share Capital Audit Report for the quarter ended 30.06.2022 within the due date | The delay is due to technical glitch in BSE filing portal. The management has taken note of the same for compliance | The company is advised to file the report within the due date. |

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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 (SS) issued by the Institute of Company Secretaries of India (ICSI). | Yes | NIL |
| 2 | Adoption and timely updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations / circulars / guidelines issued by SEBI. | Yes | Nil |
| 3 | Maintenance and disclosures on Website: The Listed entity is maintaining a functional website: <ul style="list-style-type: none"> • 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 re-directs to the relevant document(s)/ section of the website | Yes | Nil |
| 4 | Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | NIL |
| 5 | Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none"> a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries | Yes | NIL |

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| 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 SEBI LODR Regulations, 2015. | Yes | NIL |
| 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/during the financial year as prescribed in SEBI Regulations. | Yes | NIL |
| 8 | Related Party Transactions: a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or 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. | NA NA | There are no such transactions |
| 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 | NIL |
| 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 | Nil |
| 11 | Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column. | Yes | The company has paid SOP fine /penalty imposed by BSE. |
| 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 | NA | There is no change in the statutory auditors during the period |

| | | | |
|----|---|-----|-----|
| | 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 listed entities. | | |
| 13 | Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above. | Yes | Nil |

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

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 listed entity.
2. Our responsibility is to certify 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 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 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 GMVDR & Associates
Company Secretaries

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Place: Hyderabad
Date: 30.05.2024

G.M.V.Dhanunjaya Rao
M.No: F9120; C.P No. 5250
Peer Review No.1071/2021
UDIN: F009120F000502855