To,
The Board of Directors,
BERYL DRUGS LIMITED
CIN- L02423MP1993PLC007840
133 KANCHAN BAGH INDORE MP

Subject: Annual Secretarial Compliance Report of BERYL DRUGS LIMITED for the Financial Year Ended 31.03.2020

Dear Sir,

We have been engaged by BERYL DRUGS LIMITED (hereinafter referred to as the ‘Company’) bearing CIN: L02423MP1993PLC007840 whose equity shares are listed on BSE Limited and Ahmadabad Stock Exchange, 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 the provisions of all the 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.

Note: Due to outbreak of global pandemic of COVID 19 and complete lockdown throughout the country, the compliance documents for the financial year ended 31" March 2020 are verified on the basis of electronic mode without any physical verification.

Place: Indore
Date: 25.06.2020

ASHISH KARODIA
Practicing Company Secretary
Secretarial Compliance Report of BERYL DRUGS LIMITED for
the year ended 31st March, 2020

I, CS Ashish Karodia, Practicing Company Secretary, Indore have examined:

a) all the documents and records made available to us and explanation provided by
BERYL DRUGS 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 clarification,

for the year ended 31st March, 2020 ("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
b) Securities and Exchange Board of India (Issue of Capital and Disclosure
Requirements) Regulations, 2018 – Not applicable as the Company has not
issued any kind of securities during the period under scrutiny.
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) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not applicable as the Company has not issued any kind of securities during the period under scrutiny.

f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - Not Applicable as the Company has not issued any debt securities during the year under review.

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 issued any Non-Convertible and Redeemable Preference Shares during the year under review.

h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

And circulars/ guidelines issued thereunder;

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

a) The listed entity has compiled with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Compliance Requirement (Regulations/ Circulars/ guidelines including specific clause)</th>
<th>Deviations</th>
<th>Observations/ Remarks of the Practicing Company Secretary</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NIL</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder is so far as it appears from my 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 thereunder:
d) The listed entity has taken the following actions to comply with the observations made in previous reports:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Observations of the Practicing Company Secretary in the previous reports</th>
<th>Observations made in the secretarial compliance report for the year ended....</th>
<th>Actions taken by the listed entity, if any</th>
<th>Comments of the Practicing Company Secretary on the actions taken by the listed entity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NIL</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: Due to outbreak of global pandemic of COVID 19 and complete lockdown throughout the country, the compliance documents for the financial year ended 31st March 2020 are verified on the basis of electronic mode without any physical verification.