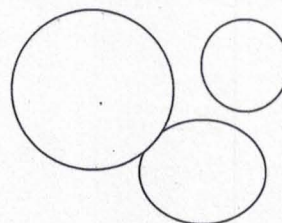


BIOGEN



PHARMACHEM INDUSTRIES LIMITED

CIN NO: L51100GJ1995PLC026702

(Formerly Known as SUN TECHNO OVERSEAS LIMITED)

Date: 21.06.2021

To,

Department of Corporate Services
BSE Limited,
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400 001

Dear Sir/Madam,

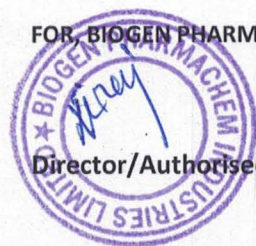
Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2021 issued by secretarial auditor Mr. Haresh Kapuriya Practicing Company Secretaries. You are requested to take the same on your record.

Thanking you,

Yours faithfully,

FOR, BIOGEN PHARMACHEM INDUSTRIES LIMITED



Director/Authorised Signatory

Registered Office Address: Shop No. 8, First Floor, Maker - 1 Building, Jawahar Road, Rajkot-360001

E mail biogenpharmachem@gmail.com



ANNUAL SECRETARIAL COMPLIANCE REPORT

*Annual Secretarial Compliance report of BIOGEN PHARMACHEM INDUSTRIES LIMITED
(FORMERLY KNOWN AS SUN TECHNO OVERSEAS LIMITED) for the year ended 31st March, 2021*

We have examined:

- (a) all the documents and records made available to me and explanation provided by **M/s. BIOGEN PHARMACHEM INDUSTRIES LIMITED (FORMERLY KNOWN AS SUN TECHNO OVERSEAS 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 on **March 31, 2021** ("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;
- 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 during the review period**)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not applicable during the Review Period**)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not Applicable during the Review Period**)





- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the review period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 up to October 2, 2018 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 w.e.f. October 3, 2018;

and circulars/ guidelines/Amendments issued there under, and based on the above examination, I 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 to the extent applicable and in the manner prescribed, 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	Regulation 6(1) of SEBI (LODR) Regulation, 2015	Non-Compliance with requirement to appoint a qualified Company Secretary for quarter ended December 2020	The Company has complied with the regulation and appointed a qualified Company Secretary and request stock exchange to waive of the penalty.
2	Regulation 14 of SEBI (LODR) Regulation, 2015	Non-Payment of Annual Listing Fees (ALF) dues to BSE Limited	The Company has paid listing fee.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under insofar 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 there under:





(d)

Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the, Practicing Company Secretary, if any.
1	BSE Limited	Regulation 6(1) of SEBI (LODR) Regulation, 2015	Levied monetary fines	The Company has complied with the regulation and appointed a qualified Company Secretary and request stock exchange to waive of the penalty.
3	BSE Limited	Regulation 14 of SEBI (LODR) Regulation, 2015- Non-Payment of Annual Listing Fees (ALF) dues to BSE Limited	Warning letter	Company has paid listing fee

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Vadodara

Date: 21.06.2021

UDIN: A026109C000491145



For, KH & Associates

Practicing Company Secretary

Kapuriya
 CS Haresh Kapuriya
 Partner

C. P. No.: 16749

Membership No. 26109