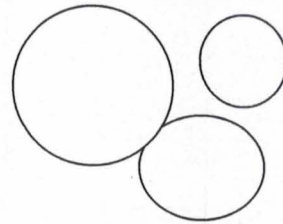


BIOGEN



PHARMACHEM INDUSTRIES LIMITED

CIN NO: L51100GJ1995PLC026702

(Formerly Known as SUN TECHNO OVERSEAS LIMITED)

Date: 13.05.2022

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 2021-22

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, 2022 issued by secretarial auditor Ms. Daksha Negi 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, 2022

I 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, 2022** ("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;
- 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 thereunder,

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.
- (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:

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	NA	NA	NA



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

Sr. No.	Observations of the Practicing 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				

Note :

- (a) Acknowledgement for sending the notices of the Meeting of the Board, General and Committees meetings are not maintained by the company.
- (b) Minutes and Attendance Registers of the Board meeting and General Meeting for the period under review were not available to check.

Place: Ahmedabad
Date: 05.05.2022

For, Daksha Negi & Associates
COMPANY SECRETARIES



[CS DAKSHA NEGI]

Practicing Company Secretary

ACS No: A41607

C. P. NO.: 20353

UDIN : A041607D000276215