



ALKALI METALS LIMITED

Plot B-5, Block III, IDA, Uppal, Hyderabad – 500 039, India
CIN: L27109TG1968PLC001196.

+91-40-2344 5961/2344 5962
+91-40-2756 2932/2720 1179
secretarial@alkalimetals.com
www.alkalimetals.com

ANISO9001&14001

COMPANY



Manufacturers of : Sodium Amide, Sodium Alkoxides, Sodium Hydride, Sodium Azide, Tetrazoles, Amino Pyridines, Pyridine Derivatives,
Cyclic Compounds, Fine Chemicals, Intermediates for pharmaceuticals and Active Pharmaceutical Ingredients

AML/Secretarial Compliance Report/20250527

Date: 27th May 2025

To
The Vice President,
Listing Department,
National Stock Exchange of India Ltd.,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Mumbai-400051
Symbol: ALKALI, Series: EQ

To
The General Manager
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001
Scrip Code: 533029

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the year ended 31st March 2025

We have enclosed the Annual Secretarial Compliance Report required under Regulation 24A of the SEBI (LODR) Regulations, 2015, for the year ended 31st March 2025 issued by a Practicing Company Secretary.

This is for your information and record.

Thanking You

Yours faithfully,
For Alkali Metals Limited

Siddharth Dubey
Company Secretary & Compliance Officer



CS B. Venkatesh Babu

B.Com., LLB., FCS

Practising Company Secretary

**Annual Secretarial Compliance Report
of
ALKALI METALS LIMITED
for the financial year ended 31.03.2025**

I have examined:

- (a) all the documents and records made available to me and explanation provided by Alkali Metals 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 Report.

For the financial year ended 31.03.2025 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 SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (LODR) 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;
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
 - (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021
 - (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (h) other regulations as applicable.
- and circulars/ guidelines 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 thereunder, wherever applicable, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide - lines 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	Audit Committee and its composition. Nomination and Remuneration committee and its composition. Stakeholder Relationship committee and its composition.	18(1) 19(1)/(2) 20(2)/(2A)	All three Committees are not fully constituted in terms of SEBI LODR during the period 21 st August 2024 to 02 nd October 2024.	Levied Fine	Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.	All three Committees are not fully constituted in terms of SEBI LODR during the period 21 st August 2024 to 02 nd October 2024.	Rs 2,46,000 (NSE) Rs. 2,58,000 (BSE)	Two Independent Directors had completed their term on 20 th August 2024 and two New Independent Directors were appointed on 21 st August 2024. Consequent to the above mentioned changes, re-constitution of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee was warranted. The Board duly re-constituted the Committees on 3 rd October 2024.	On receipt of notice from the Stock Exchanges, Company provided the clarification. However, both the stock exchanges levied fine from 21 st August 2024 to 30 th September 2024. Thereafter, the Company immediately filed the waiver request application to the designated stock exchange i.e NSE in terms of the applicable regulations. NSE after review granted waiver of fine and the Decision Letter was issued on 21 st February 2025. The BSE verified the waiver granted by NSE and thereafter granted the waiver of the fine and confirmed the same on 6 th May 2025	

V. Venkatesh Babu

CS B. VENKATESH BABU
CPNO.5103
COMPANY SECRETARY

(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 (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended (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
1	The Company was in the list of Top 2000 Companies as per Market Capitalization during 2019-20 and required to have 6 members in the Board of Directors from April 1, 2020. At the starting of the financial year, the Company was in compliance of the provisions relating to the composition of the Board. In the month of June 2020 one of the Directors of the Company had resigned and the Company had faced challenges to fill the vacant position due to the Covid 19 pandemic. The Company requested the Stock Exchanges to provide time till March 2021 to comply with the said requirement. Meanwhile a Director was appointed in the month of February 2021.	2020-21	To have minimum 6 Directors as per Regulation 17(1)	Non compliance of not having 6th Director. Exchanges levied fine from 1st October 2020 to 11th February 2021. Company made application for waiver of fine and got total waiver of fine from NSE and Part waiver of fine from BSE.	Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.	Company had taken proper action and closed the issue by getting the waiver of fine imposed by the stock exchanges.



- I. I 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	
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	
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> ● The Listed entity 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 re-directs to the relevant document(s)/ section of the website 	Yes	
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	
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 	NA	Company don't have any subsidiary Companies, not required to comply this clause
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	
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	

V. Venkatesh Babu

CS. VENKATESH BABU
 CP.NO.5103
 COMPANY SECRETARY

8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	
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	
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	
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 above.	Yes SOP fine as provided above.	
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 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.	NA	As there is no resignation of auditors during the reporting period, this compliance is not applicable.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

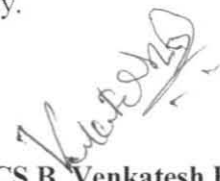
I further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. – Not Applicable.



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. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

Place: Hyderabad
Date: May 19, 2025


CS B. Venkatesh Babu
Company Secretary
FCS No.: 6708
CP No.: 5103
PR No. : 1954/2022
UDIN : F006708G000371831

