Vital Chemtech Limited :
Corporate Office:
B-406, Mondeal Heights, Opp. Karnavati Club,
S.G.Highway, Ahmedabad, Gujarat, INDIA-380015.
Plant Address :
Plot No : D-3 / 151 & 158, GIDC, Dahej III,
Dist. Bharuch, Gujarat, INDIA-392 130.
+91 - 79 - 4600 5840
www.vitalgroup.co.in info@vitalgroup.co.in
CIN Number : L24299GJ2021PLC127538

vital Chemtech

To, **Date:30.05.2026**
The Manager-Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, Block G, C/1, Bandra Kurla
Complex, Bandra (E), Mumbai – 400 051
Maharashtra, India

Dear Sir/Madam,

SUBJECT: Submission of Secretarial Compliance Report for the year ended on March 31, 2026.

Ref. : Vital Chemtech Limited (Symbol: VITAL), ISIN: INE0L4K01016

Dear Sir/Madam,

With reference to the captioned subject, please find enclosed herewith Secretarial Compliance Report of the Company issued by M/s. SCS and Co. LLP, Practicing Company Secretary for the year ended on March 31, 2026.

Kindly take the same on your record and oblige us.

Thanking You,

For, Vital Chemtech Limited

VIPUL JATASHANKER BHATT
Digitally signed by VIPUL JATASHANKER BHATT
Date: 2026.05.30 16:19:47 +05'30'

Vipul Bhatt
Chairman & Managing Director
DIN: 06716658
Place: Ahmedabad

Encl.: A/a-

To,
The Board of Directors,
Vital Chemtech Limited
CIN: L24299GJ2021PLC127538
Registered office:
B-406, Mondeal Heights, Opp. Karnavati Club, S. G. Highway,
Ahmedabad-380015, Gujarat

Dear Sir/Madam,

We have been engaged by **Vital Chemtech Limited** (hereinafter referred to as 'the Company' bearing CIN: - L24299GJ2021PLC127538) whose Equity Shares are Listed on National Stock exchange of India Limited (NSE) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Master Circular HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026, NSE Master Circular Ref No. NSE/CML/2026/10 dated April 30, 2026 and NSE Circular Ref. No: NSE/CML/2023/30 dated April 10, 2023 to issue the Secretarial Compliance Report thereon.

The responsibility for maintaining records and devising proper systems to ensure compliance with the provisions of all applicable SEBI Regulations and circulars/guidelines issued thereunder rests with the management of the Company. Our responsibility is to verify compliance by the Company with these applicable SEBI Regulations and circulars/guidelines issued from time to time and to issue a report thereon.

The audit has been conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI), and in a manner that involved such examinations and verifications as were considered necessary and appropriate for the purpose.

The Secretarial Compliance Report for the financial year ended March 31, 2026 is enclosed herewith for your reference and records.

Thanking you,
Yours faithfully,

For, SCS and Co. LLP
Company Secretaries
Firm Registration Number: - L2020GJ008700
Peer Review Number: - 5333/2023

SCS AND CO. LLP
COMPANY SECRETARIES
AHMEDABAD

Anjali Sangtani
Designated Partner
M. No. A41942 COP: 23630
UDIN: A041942H000544840

Date: 29-05-2026
Place: - Ahmedabad

SECRETARIAL COMPLIANCE REPORT OF VITAL CHEMTECH LIMITED
(CIN: L24299GJ2021PLC127538)
For the Financial Year ended on March 31, 2026
[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, have examined:

a) all the documents and records made available to me and explanation provided by Vital Chemtech Limited ("the Company" or "the listed entity" or "VITAL"),
b) the filings/ submissions made by the listed entity to the stock exchange,
c) website of the listed entity and
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, 2026 ("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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (to the extent applicable);
e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
f) And circulars/ guidelines/Amendments issued thereunder.

Based on the above examination and explanation/clarification given by the Company and its officers/KMP's, we hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	**Secretarial Standard:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	-
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.	Yes	-
	• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes	-
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website.	Yes	-

SCS AND CO. LLP COMPANY SECRETARIES AHMEDABAD

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
	• Timely dissemination of the documents/ information under a separate section on the website.	Yes	-
	• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website.	Yes	-
4.	**Disqualification of Director:** None of the Director of the Company 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:** **a)** Identification of material subsidiary companies.	NA	There is no material subsidiary of the entity during the FY 2025-26
	b) Requirements with respect to disclosure of material as well as other subsidiaries.	Yes	
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 as prescribed in SEBI Regulations.	Yes	As per SEBI LODR and Companies Act, the Board Evaluation is required to be done once in a year. Formal process of Performance Evaluation was carried out in the Month of March 24, 2026 for FY 25-26.
8.	**Related Party Transactions** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.	Yes	Since, all Related party transactions were entered after obtaining prior approval of audit committee point (b) is not applicable
	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	
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 Actions 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.	Yes	**No action was taken/ required to be taken.**

SCS AND CO. LLP COMPANY SECRETARIES AHMEDABAD

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
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 section V-D of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	The Statutory Auditors of the Listed Entity did not resign during the Review Period. The Listed Entity does not have a material subsidiary.
13.	Additional Non-compliances, if any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	**No additional non-compliance observed during the review period.**

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 to the extent applicable and in the manner prescribed except in respect of matters specified below;

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including speific 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 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 and SEBI Master Circular No. HO/49/14/14(7)2025-	Regulation 30 read with Requirement of SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023 and SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated January 30, 2026	Disclosure of material events / information by listed entities under Regulations 30 and 30A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations,	-	-	-	-	There was delay of 48 hours in submission of disclosure w.r.t. temporary disruption of operations at P2S5 plant of the Company submitted on Exchange portal on 19.05.2025 which took place on 16.05.2025	The delay in submission of this disclosure was due to the immediate and intensive efforts undertaken to manage the situation and provide timely assistance to the affected personnel. Further, the company will comply with regulations more quickly, stay informed about all circulars issued by the stock exchanges, and meet all necessary compliance standards.	-

SCS AND CO. LLP COMPANY SECRETARIES AHMEDABAD

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including speific 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
	CFD-POD2/1/3762/2026 dated January 30, 2026		2015							

#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.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Action Taken by	Type of Action	Details of Violation	Fine Amount	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Company has maintained internally Structured Digital Database in Digital Software for FY 2024-25 with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. **However, few entries in the SDD software were captured delayed by the Company.** Based on our verification of the SDD maintained by the company, we are of the opinion that the SDD can be maintained cum utilized more efficiently and effectively by the Company in accordance with the spirit of the compliance requirement under SEBI PIT Regulations, 2015.	**March 31, 2025**	Prohibition of Insider Trading Regulations, 2015.					The delay in submission was due to administrative oversight and not intentional. The concerned designated person has been advised, and the company has strengthened its internal compliance framework to ensure timely entries going forward.	

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2.	The filing relating to the below mentioned announcement under Regulation 30 of LODR regulations were filed delayed: - Subsidiary company named Vital Alkoxides Private Limited has received Provisional Consent Order from Gujarat Pollution Control Board, which provides Consolidated consent and authorization (CC&A) via Consent No. AWH-134837 under Water (Prevention and Control of Pollution) Act-1974, Air (Prevention and Control of Pollution) Act-1981and Hazardous Waste (Management, Handling and Transboundary Movement) Rules'2008 granted on June 07, 2024 but submitted with a delay of seven days, on June 14, 2024.	**March 31, 2025**	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015					The delay was inadvertent and occurred due to the late communication received from the concerned official of the Government authority regarding the issuance of the certificate. As a result, the Company was unable to make the disclosure within the stipulated timeline. The Company has taken note of the lapse and has initiated appropriate steps to strengthen its internal processes and ensure stricter compliance with the prescribed timelines under the SEBI Regulations.	

 # The Company's equity shares were migrated to the Main Board of NSE w.e.f. March 11, 2026. Though Secretarial Compliance report (SCR) was not applicable for FY 2024–25, the same was submitted at the time of migration; accordingly, the related observation has already been covered in the previous report above.

We further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

a. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
b. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
c. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
d. Securities and Exchange Board of India (Issue and Listing of Securitised Debt Instruments and Security Receipts) Regulations, 2008;
e. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
f. The reporting under **Section V-D** of the Master circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries".

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.

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COMPANY SECRETARIES
AHMEDABAD

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, SCS and Co. LLP
Company Secretaries
Firm Registration Number: - L2020GJ008700
Peer Review Number: - 5333/2023

Anjali Sangtani
Designated Partner
M. No. A41942 COP: 23630
UDIN: A041942H000544840

Date: - 29-05-2026
Place: - Ahmedabad