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हिन्दुस्तान ऑर्गेनिक केमिकल्स लिमिटेड
HINDUSTAN ORGANIC CHEMICALS LIMITED

(भारत सरकार का उद्यम A Govt. of India Enterprise)
पंजीकृत / निगमित कार्यालय & फैक्टरी Registered / Corporate Office and Factory
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HOC/BSE/428BM/1st Qtr/2026

7th August, 2026

BSE Limited.,
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai – 400 001

Sir/ Madam,

Sub: Comments of Board of directors on Fine imposed by BSE for Q 4 of FY 2025-26 with regard to non-compliance of requirement pertaining to SEBI LODRR

This has reference to the e-mails dated 27.05.2026 and 22.06.2026 received from BSE Limited ("BSE"), informing the Company that penalties of Rs. 4,50,000/- plus applicable GST and Rs. 42,000/- plus applicable GST, respectively, have been imposed for non-compliance with Regulation 17(1) (Composition of the Board of Directors) and late compliance of Regulation 24A(2) (Secretarial Compliance Report) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations") during the quarter ended March 31, 2026. BSE has further informed that these matters shall be placed before the Board of Directors of the Company and the comments made by the Board shall be duly disseminated on the Exchange portal. Accordingly, in the 428th Board meeting held on 07.08.2026, this matter was reported to Board of Directors.

The Board noted that the appointment of Directors in HOCL is carried out by the Ministry of Chemicals & Fertilizers, Department of Chemicals & Petrochemicals, Government of India. Therefore, the non-compliance with Regulation 17(1) of the SEBI LODR Regulations was beyond the control of the Company. With regard to the late compliance under Regulation 24A(2), it was reported to the Board that the Annual Secretarial Compliance Report was submitted within the prescribed timeline in both PDF and XML formats. While the PDF report submitted was correct, the XML file inadvertently pertained to the previous financial year instead of the current financial year due to an unintentional technical error during the filing process. The error was subsequently identified and rectified. The Board informed that more caution should be exercised when making the BSE filings.

Submitted for kind information and records.

Thanking you.

Yours faithfully,
For Hindustan Organic Chemicals Limited

Subramonian H
Company Secretary & Compliance Officer