



Manali Petrochemicals Limited

SPIC House, 88, Mount Road, Guindy, Chennai - 600 032
Telefax:044 - 2235 1098 Website:www.manalipetro.com
CIN: L24294TN1986PLC013087

Ref: MPL / Sect1 / BSE & NSE / E-2 & E-3 / 2020
20th June 2020

The Manager, Listing Department, BSE Limited Corporate Relationship Department 1 st Floor, New Trading Ring, Rotunda Building, P J Tower, Dalal Street, Fort, <u>Mumbai – 400 001.</u> <u>Stock Code: 500268</u>	The Listing Department National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No.C/1, G Block, Bandra-Kurla Complex, Bandra (East) <u>Mumbai – 400 051</u> <u>Stock Code: MANALIPETC</u>
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Dear Sir,

Sub: Regulation 24A of the SEBI (LODR) Regulations, 2015 – submission of Annual Secretarial Compliance Report for the year 2019-20

Please find enclosed the Annual Compliance Report issued by Ms. B Chandra, Practising Company Secretary, under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We request you to kindly take the above information on record.

Thanking you

Yours faithfully

For Manali Petrochemicals Limited

RAMADAS
KOTHANDARAMA
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KOTHANDARAMAN
Date: 2020.06.20 07:41:31
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R Kothandaraman
Company Secretary
Encl.: As stated



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Plant I: Ponneri High Road, Manali, Chennai 600068
Plant II: Sathangadu Village, Manali, Chennai 600068
E- mail: companysecretary@manalipetro.com





B.CHANDRA
PRACTISING COMPANY SECRETARY

AG 3 RAGAMALIKA,
No.26, Kumaran Colony Main Road,
Vadapalani,
Chennai - 26

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Annual Secretarial Compliance Report
(Pursuant to Regulation 24A of the SEBI (LODR) Regulations 2015)

NAME OF THE LISTED ENTITY: MANALI PETROCHEMICALS LIMITED

REPORTING PERIOD : Year ended 31.03.2020

I/We, B Chandra, Practising Company Secretary holding Certificate of Practice No.7859 have examined:

- (a) all the documents and records made available to us and explanation provided by MANALI PETROCHEMICALS LIMITED,
- (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 31.03.2020 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 the following:-

- (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;
- and circulars/ guidelines issued thereunder;

Since the Company has not made any Issue of Capital or Debt Securities or Preference Shares, or Buyback of Securities or provided any Share Based Employee Benefits during the year compliance with the provisions of the following Regulations did not arise:

- (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 (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

Based on the above examination, I/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, 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	Sch. III A 13 read with Reg. 30(4) requires reporting of proceedings of Annual General Meeting to be done within 24 hours.	Delay in reporting by about six hours	Delay is reportedly due to network error
2	Reg 44(3) submit voting results of shareholders within 48 hours to stock exchange	Delay in reporting by about five hours	Delay is reportedly due to network error

There was an error in the reporting of Audit Committee composition due to inadvertent omission to mention date of cessation of a director from the audit committee during the quarter and the same was set right by filing a revised corporate governance report for the quarter ended 30th June 2019 following a query raised by NSE vide their letter dated 30th July 2019.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our 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 thereunder:

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
NIL				

(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

There has been no resignation of Statutory Auditors during the year under review. The listed entity has complied with Clauses 6(A) and 6(B) of SEBI circular no CIR/CFD/CMD1/114/2019 dated 18.10.2019.

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Place: Chennai
Date: 18/06/2020

Signature:
Practicing Company Secretary: B CHANDRA
ACS No.: 20879
C P No.: 7859
UDIN: A020879B000353266