

Ref: MPL/SectI/BSE&NSE/E-2&E-3/2021

8th June 2021

The Manager,
Listing Department,
BSE Limited
Corporate Relationship
Department
1st Floor, New Trading Ring,
Rotunda Building, P J Tower,
Dalal Street, Fort,
Mumbai - 400 001.
Stock Code: 500268

The Listing Department
National Stock Exchange of
India Limited
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block,
Bandra-Kurla Complex,
Bandra (East)
Mumbai - 400 051
Stock Code: MANALIPETC

Dear Sir,

Sub: Regulation 24A of the SEBI (LODR) Regulations, 2015 -
submission of Annual Secretarial Compliance Report for the
year 2020-21

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 confirm having submitted the information in
XBRL also.

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

Thanking you

Yours faithfully

For Manali Petrochemicals Limited

R Kothandaraman

Company Secretary

Encl.: As stated

Factories :

Plant - 1 : Ponneri High Road, Manali, Chennai - 600 068

Plant - 2 : Sathangadu Village, Manali, Chennai - 600 068

Phone : 044 - 2594 1025 Fax : 044 - 2594 1199

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 31.03.2021

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 31.03.2021 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:-

Due to delayed receipt of the signed audit report from the auditors on account of lockdown and the auditor and his team working from different locations, the intimation of the results for the FY ended 31-03-2020 was delayed by about 30 minutes; it has been explained by the Company that the delay was beyond their control, and further the anticipated delay had been informed to the Stock exchange within 30 minutes of the conclusion of the meeting.

- (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
1	Sch. III A 13 read with Reg. 30(4) requires reporting of proceedings of Annual General Meeting to be done within 24 hours.	31.03.2020	Does not arise as the delay was due to a network error.	NA
2	Reg 44(3) submit voting results of shareholders within 48 hours to stock exchange	31.03.2020	Same as above	NA

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 during 2019-2020. There has been no resignation of Statutory Auditors during the year under review

BALASUBRAMA
NIAN CHANDRA

Digitally signed by
BALASUBRAMANIAN CHANDRA
Date: 2021.06.07 13:59:40
+05'30'

B CHANDRA
Practising Company Secretary
Membership No.: 20879
CP No.: 7859
UDIN: A020879C000427824

Place : CHENNAI
Date : 07/06/2021