



GOKUL

Gokul Refoils & Solvent Ltd.

Corporate Office :
"Gokul House", 43 Shreemali Co-op. Housing Society Ltd.
Opp. Shikhar Building, Navrangpura,
Ahmedabad-380 009. Gujarat (India)
Ph. : +91-79-66304555, 66615253/54/55
Fax : +91-79-66304543 Email : grsl@gokulgroup.com
CIN : L15142GJ1992PLC018745

June 29, 2020

To,
Dept. of Corporate Services,
BSE Ltd.
25th Floor, Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai – 400 001
Company Code 532980

To,
National Stock Exchange of India Ltd.
Exchange Plaza,
Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (E) Mumbai - 400 051
Company Code GOKULEQ

Dear Sir/ Madam,

Ref: Regulation 24A of SEBI (LODR) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2020

Please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by Yash Mehta & Associates, Company Secretaries in Practice, for the Financial Year ended March 31, 2020.

Kindly take the same on your record.

Thanking You

Yours truly,
For, Gokul Refoils & Solvent Ltd.

Abhinav Mathur
Company Secretary & Compliance Officer

Regd. Office & Works : State Highway No-41, Nr. Sujapur Patia, Sidhpur-384 151. Dist. Patan, Gujarat (India)
Phone : +91-2767-222075, 220975 Fax : +91-2767-223475 E-mail : grsl@gokulgroup.com

Haldia Refinery Unit : J.L.N. 149, Plot No. Near Essar Petrol Pump, HPL Link Road, P. O. Debhog City Centre,
P.S. Bhabanipur, Haldia Purba - Medanipur - 721657 (West Bengal) Phone : 03224 252839



SECRETARIAL COMPLIANCE REPORT
OF
GOKUL REFOILS & SOLVENT LIMITED

FOR THE YEAR ENDED ON 31ST MARCH, 2020

We, M/s. Yash Mehta and Associates, Practicing Company Secretaries have examined:

- 1) all the documents and records made available to us and explanation provided by Gokul Refoils & Solvent Limited — CIN L15142GJ1992PLC018745 ("the listed entity"),
- 2) the filings/ submissions made by the listed entity to the stock exchanges,
- 3) website of the listed entity,
- 4) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2020 ("Review Period") in respect of compliance with the provisions of:

- i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued thereunder; and
- ii) 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 for the financial year ended 31.03.2020 ("Review Period"), have been examined, and include:

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

The Company has complied with filing of required documents under various regulations, to the extent applicable to the Company, during the year under review.

- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018,





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- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

During the year under review, there were following interse transfer of equity shares amongst Promoter and Promoter Group along with PAC.

Date of Transfer	Name of Transferor	No of shares transferr ed	Name of Transferee	% of share transf erred	Whether all required Disclosures made
17.09.2019	Manjulaben Thakkar	109,65,000	Bhikhiben Rajput	8.31%	Yes
19.09.2019	Manjulaben Thakkar	75,00,000	Dharmendrasinh Rajput	5.69%	Yes
25.09.2019	Kanubhai Thakkar	62,52,349	Dharmendrasinh Rajput	4.74%	Yes
24.12.2019	Jayeshkumar Thakkar	6,23,765	Dharmendrasinh Rajput	0.47%	Yes
03.12.2019	Jashodaben Commodities LLP	65,75,000	Profitline Securities Private Limited	4.99%	Yes

The Disclosures required under Regulations 10(5), 10(6), 10(7), 29(1) and 29(2), were filed with the Stock Exchange within due course of time to the extent applicable.

The Company has also complied with filing of Annual Disclosures under Regulation 30(1) and 30(2) of the said Regulations.

- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;





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- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

The Company has received required disclosures under Regulation 7(1) and 7(2) of the said Regulations during the year under review and further submitted disclosures received under Regulation 7(2) to Stock Exchange within due course of time.

- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

However, regulations mentioned above under clause (f) & (g) are not applicable to the Company during the review period; and based on the above examination, 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

- 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 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:





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Sr. No.	Action Taken by	Details of violations	Details of action taken e.g. fines, remarks of the warning letter, Practicing Secretary, debarment, etc.	Observations/re marks of the Practicing Company Secretary, if any.

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	Action Taken by Listed Entity, if any	Comments of the Practicing Company Secretary on the Action Taken by Listed Entity

Not Applicable



Yash H. Mehta

YASH MEHTA
PROPRIETOR
FOR YASH MEHTA & ASSOCIATES
COMPANY SECRETARIES
ACS No.: 45267 C. P. No.: 16535
UDIN: A045267B000390403

Date : 27.06.2020
Place : Ahmedabad