



CUBEX TUBINGS LIMITED

(AN ISO 9001:2008 CERTIFIED COMPANY)



Date: 30th May 2019

To

The General Manager Department of Corporate Services BSE LTD, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001.	The Manager Listing Compliance The National Stock Exchange of India Limited BKC Complex Bandra Kurla Mumbai
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CUBEX TUBINGS LIMITED

Dear Sir,

Sub : Annual Secretarial Compliance Report for the Year ended 31st March 2019

**Ref : Regulation 24A of SEBI (LODR) Regulations, 2015 as amended in 2018
SEBI Circular No. CIWCFD/CMDI/27/2019 dated 8th February 2019.**

In terms of Clause 3(b)(ii) of SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 8th February 2019, we are submitting herewith Annual Secretarial Compliance Report of the Company for the year ended 31st March 2019 issued by the Practising Company Secretary. The said report has been noted by the Board of Directors of the Company at its meeting held on 30.05.2019.

Kindly take the same on record.

Thanking you,

Yours faithfully,

Yours truly,

For CUBEX TUBINGS LIMITED

P R Bhandari
Managing Director

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P. SARADA COMPANY SECRETARIES

P. SARADA

M.Com., LL.B., A.C.S

8-3-168/B/10, Siddhartha Nagar (North)

ESI, Near A.G. Colony

Hyderabad - 500 038

Cell : 98483 02393

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SECRETARIAL COMPLIANCE REPORT OF

M/s. CUBEX TUBINGS LTD

FOR THE YEAR ENDED 31ST MARCH, 2019

I, **Sarada Putcha**, Company Secretaries, Hyderabad has examined:

- (a) all the documents and records made available to me and explanation provided by **M/s. CUBEX TUBINGS LTD (CIN - L27109TG1979PLC002504)** listed entity.
- (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 31st March 2019 (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 (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

- (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;
- (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;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

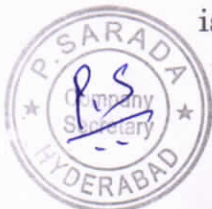
and circulars/ guidelines issued thereunder;

and based on the above examination, I 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
NIL	NIL	NIL	NIL

- (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 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	of	Details of action taken Eg. Fines, warning letter, debarment, etc;	Observations/ remarks of the Practicing Company Secretary, if any
NIL	NIL	NIL		NIL	NIL

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

Date: 30-05-2019
Place: Hyderabad



Signature: *P. Sarada*
Sarada Putcha
Company Secretaries
ACS No: 21717
C. P. No.: 8735

P. Sarada

PUTCHA SARADA
PRACTISING COMPANY SECRETARIES
M. No. : 21717
C. P. No. : 8735