



Petrochemicals Limited

Regd. Office & Factory: 396(P)-395/4 (P),
Moraiya Village, Sarkhej-Bavla Highway,
Ahmedabad-382 210. Gujarat, (India)

Tele : 079 - 29798623

Email : investorgrievances.cilnova@chiripalgroup.com

Web. : www.cnpcl.com

CIN : L17111GJ2003PLC043354

30th May, 2023

To,
BSE Limited
Corporate Relationship Department
P. J. Towers,
Dalal Street, FORT,
Mumbai – 400 001

Script Code: 533407

Dear Sir/Madam,

**Sub: Compliance under Regulation 24A of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015**

In terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith Secretarial Compliance Report, for the financial year ended 31st March, 2023.

You are requested to take the same on your record.

Thanking you,
Yours faithfully,

For CIL Nova Petrochemicals Limited

Vivekanand Chaudhary
Whole Time Director
DIN: 09815515

Secretarial Compliance Report of CIL NOVA PETROCHEMICALS LTD**(CIN: L17111GJ2003PLC043354) for the year ended 31st March, 2023**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **CIL NOVA PETROCHEMICALS LTD** (“the 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, 2023 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; **Not Applicable during the review**
- (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; **Not Applicable during the review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable during the review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the review period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable during the review period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Particulars Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
01.	<u>Secretarial Standard</u>	Yes	NA

Sr. No.	Particulars	Particulars Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
	The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3		
02.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI	Yes	NA
	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none">• The Listed entity is maintaining a functional website• Timely dissemination of the documents/ information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	NA
	<u>Disqualification of Director:</u> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	NA
	<u>To examine details related to Subsidiaries of listed entities:</u> <ul style="list-style-type: none">(a) Identification of material subsidiary companies(b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	NA
	<u>Preservation of Documents:</u>	Yes	NA

Sr. No.	Particulars	Particulars Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
	The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015		
	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	NA
	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions	Yes	NA
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee	NA	As there is no instances for prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee
	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NA
	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	No	The Company is under implication of SDD Compliance

Sr. No.	Particulars	Particulars Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	Yes	- On various occasion, the Company has not complied with Compliance with LODR, more stipulated under.
	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation /circular /guidance note etc.	Yes	NA

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

- (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 clauses)	Reg/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/Remarks of the Practising Company Secretary	Management Response	Remark
01	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Reg 6(1)	Non-compliance with the requirement to appoint a qualified company secretary as the compliance officer	BSE Ltd	Fine	The company does not have a compliance officer who is also a qualified company secretary.	8,260	The company does not have a compliance officer who is also a qualified company secretary.	The Management will take corrective measures.	NA
02	Securities and Exchange Board of India (Listing Obligations and Disclosure	Reg. 31	The Company is in delay in filing of Share Holding Pattern	BSE Ltd	Fine	The Company is in delay in filing of Share	141600	The Company is in delay in filing of Share Holding Pattern	The Management will take corrective	NA

	Requirements) Regulations, 2015					Holding Pattern			measurements.	
03	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Reg. 19(2)	The NRC Committee not properly constituted	BSE Ltd	Fine	The NRC Committee not properly constituted	217120	The NRC Committee not properly constituted	The Management will take corrective measurements.	NA
04	SEBI (Prohibition of Insider Trading) Regulations, 2015	Reg. 3(5) & 3(6)	The Company is not maintained Data as per SDD Compliance	-	-	The Company is not maintained Data as per SDD Compliance	-	The Company is not maintained Data as per SDD Compliance	The Management will take corrective measurements.	NA

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clauses)	Reg/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

For, K Jatin & Co.
 Company Secretaries
 (UCN: S2017GJ508600)

Date: 30 May 2023
 Place: Ahmedabad
 UDIN: F011418E000422158

Digitally signed by
JATINBHAI HARISHBHAI KAPADIA
 Proprietor
 Certificate No: 12043
 Member since: 1418
 Date: 2023.05.30
 13:14:31 +05'30'