

**Date: 24<sup>th</sup> June, 2021**

**CNPCL/SE/2021/06/02**

To,  
BSE Limited  
Compliance Department,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400001  
Maharashtra  
**Ref: Security Code: 533407**  
**Security Id: CNOVAPETRO**

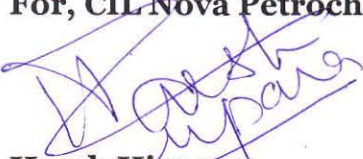
**Sub: Submission of Annual Secretarial Compliance Report for year ended March 31, 2021.**

Sir/Madam,

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015, the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021, conducted by K. Jatin & Company, Practicing Company Secretaries is enclosed herewith.

Kindly take the same on your record and oblige.

**For, CIL Nova Petrochemicals Limited**

  
**Harsh Hirpara**  
**Company Secretary**



**SECRETARIAL COMPLIANCE REPORT OF  
CIL NOVA PETROCHEMICALS LIMITED  
FOR THE YEAR ENDED MARCH 31, 2021**

I Jatin Harishbhai Kapadia have examined:

- (a) all the documents and records made available to us and explanation provided by CIL NOVA PETROCHEMICALS LIMITED (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges website of the listed entity,
- (c) any other document/ filing, as may be relevant,

which has been relied upon to make this certification, for the year ended **March 31, 2021** (“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, 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;

During the period of our audit the listed entity has not done any buy back of its securities. Hence the reporting of compliance under these regulations does not arise.

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

During the period of our audit the listed entity has not issued/granted any Share Based Employee Benefits to their employees. Hence the reporting of compliance under these regulations does not arise.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

During the period of our audit the listed entity has not issued/listed any Debt Security. Hence the reporting of compliance under these regulations does not arise.

(g) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013;

During the period of our audit the listed entity has not issued/listed any Non-convertible and Redeemable Preference Shares. Hence the reporting of compliance under these regulations does not arise.

(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;

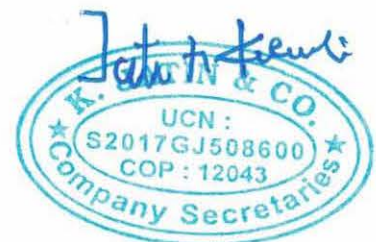
and based on the above examination, I hereby report that, during the Review Period:

- (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---- |  |            |   |

- (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 | 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...<br><i>(The years are to be mentioned)</i> | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| NIL     |  |  |  |  |

**K. JATIN & CO.,**  
**(COMPANY SECRETARY)**  
**(UCN:S2017GJ508600)**



  
**JATINBHAT HARISHBHAI KAPADIA**

**DATE: JUNE 23, 2021**  
**PLACE: AHMEDABAD**  
**UDIN: A026725C000501529**

**PROPRIETOR**  
**COP: 12043**  
**ACS: 26725**