

# Oil Country Tubular Ltd.

9, Kanchanjunga, King Koti Road, Hyderabad - 500 001  
Telangana, India. 📞 +91 40 2478 5555, 📠 +91 40 2475 9299  
CIN: L26932TG1985PLC005329, GSTIN: 36AAACO2290H1ZJ



OCTL/SEC/114450 /2020  
June 25<sup>th</sup> , 2020

Bombay Stock Exchange Ltd  
BSE's Corporate Relationship Dept  
1<sup>ST</sup> Floor, New Trading Ring  
Routunga Building, P J Towers  
Dalal Street  
**MUMBAI – 400 001**

National Stock Exchange of India Ltd  
Exchange Plaza  
5<sup>TH</sup> Floor, Plot No: C/1  
G-Block, Bandra Karla Complex  
Bandra East  
**MUMBAI – 400 051**

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report under Regulation 24A for FY 2019--2020**  
**Ref : BSE Scrip Code: 500313; NSE Scrip Code: OILCOUNTUB.**

We are enclosing herewith the Annual Secretarial Compliance Report issued by Ms.Manjula Aleti., Practicing Company Secretary, and Hyderabad. in compliance with Regulation 24A of SEBI (LODR) Regulation,2015 for the Financial year 2019-2020 .

This is for your information and record.

Thanking You

Yours faithfully  
for **Oil Country Tubular Limited**

**J RAMAMUNI REDDY**  
**CHIEF FINANACIAL OFFICER**

Encl. a/a

# MANJULA ALETI & ASSOCIATES

## Company Secretary in Practice

### SECRETARIAL COMPLIANCE REPORT

For the year ended 31<sup>st</sup> March, 2020

(Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,  
OIL COUNTRY TUBULAR LIMITED  
(CIN: L26932TG1985PLC005329)  
9, Kanchanjunga, KingKoti  
Hyderabad - 500001

I have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/guidelines issued thereunder for the Financial Year ended 31<sup>st</sup> March, 2020 for M/s. OIL COUNTRY TUBULAR LIMITED ("the company"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I have examined:

- (a) the documents and records made available to me and explanation provided by the company,
- (b) the filings/ submissions made by the company to the stock exchanges,
- (c) website of the company,
- (d) other documents/ filings that are found to be relevant to rely upon to make this certification,

for the year ended 31<sup>st</sup> March, 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”);
- iii) The following Regulations prescribed under the Securities and Exchange Board of India Act,1992 (‘SEBI Act’) and the circulars /guidelines issued thereunder , have been examined:-
  - a) The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
  - b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;and circulars/ guidelines issued thereunder;
  - c) The provisions of the Securities and Exchange Board of india (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

The following provisions and the circulars/ guidelines issued thereunder were not applicable to the company under the Review Period:

- i. The provisions of Securities and Exchange Board of India (buyback of Securities) Regulations,2018;
- ii. The provisions of Securities and Exchange Board of India (Issue of capital and Disclosure Requirements ) Regulations,2018;
- iii. The provisions of Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- iv. The provisions of Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2018;
- v. The provisions of Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares ) Regulations, 2013;
- vi. The provisions of Securities and Exchange Board of India ( Delisting of Equity Shares) Regulations,2009
- vii. The provisions of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



Based on my examination and verification of the documents and records produced to me and according to the information and explanations given to me by the Company, I report that:-

- a) The company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- c) There are no actions taken against the listed entity/ its promoters/directors 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 there under.

However during the review Period , the Company has received Notice from the Stock Exchanges in where the shares are listed and the reply given by the Company within the specified time given by the Stock exchanges.

During the Audit period the Company has been admitted for Insolvency Resolution Process by the Hon'ble NCLT, Hyderabad Bench vide order CP(IB) No.220/7/HBD/2019 dt. 28.01.2020.

- d) There are no instances found to me in the listed entity to qualify the report with any observations.

For MANJULA ALETI & ASSOCIATES  
Company Secretary In Practice



CS Manjula A  
Proprietor

CS:10380, COP : 13279

UDIN: F010380B000379287

Place: Hyderabad  
Date: 25th June,2020