



DNL/138/BSE/633/2020
July 29, 2020

To,
BSE Limited
Department of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Steet, Fort,
Mumbai-400 001

Dear Sir,

Scrip Code: 506401

Sub: Secretarial Compliance Report for the Financial year 2019-20

Pursuant to provisions of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we enclose herewith Secretarial Compliance Report of the Company for the Financial year ended March 31, 2020, issued by Shri Dinesh Joshi, Designated Partner, KANJ & Co. LLP, Company Secretaries, Pune.

Kindly take the same on your records.

Thanking you,

For DEEPAK NITRITE LIMITED


ARVIND BAJPAI
Company Secretary

Encl.: as above

DEEPAK NITRITE LIMITED

CIN: L24110GJ1970PLC001735

Registered & Corporate Office:

Aaditya-I, Chhani Road, Vadodara-390 024. Gujarat, India.

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**SECRETARIAL COMPLIANCE REPORT OF DEEPAK NITRITE LIMITED
FOR THE YEAR ENDED 31ST MARCH 2020**

I, CS Dinesh Joshi, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by **Deepak Nitrite Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other documents and information received from the MCA portal and stock exchange websites,

for the year ended 31st March 2020 ("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: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (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: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

Dinesh Joshi

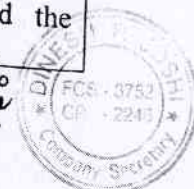

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder.

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 including SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October 2019 and has amended the terms of appointment of Statutory Auditor to cover the conditions specified under Clause 6(A) and 6(B) of the said circular, except in the matter specified below:-

Sr. No	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 31 of the Securities and Exchange Board of India (Listing and Disclosure Requirements) Regulations, 2015	The Company had uploaded the shareholding pattern for the quarter ended December 31, 2019 with BSE Limited (BSE) as well as with National Stock Exchange of India Limited (NSE) pursuant to Regulation 31 of the Securities and Exchange Board of India (Listing Regulations and Disclosure Requirements) Regulations, 2015, The same got reflected on the website of NSE on January 21, 2020 however on BSE website on January 23, 2020.	We have been informed that due to some technical issues at BSE's platform, the said shareholding pattern appears to have been filed with a delay of two days on BSE website. The Company has brought this matter before BSE and representations are made, a response on which is awaited from BSE. We have verified this fact during our audit and found the same in order.


Dinesh Joshi



- (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) No actions had been 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 except the following penalty imposed by the BSE Limited:

Sr. No.	Action taken by	Details of violation	Details of action taken (Fine imposed)	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Penalty from company - SOP	It seems that the penalty is imposed on filing of shareholding pattern for the quarter ended December 31, 2019 with BSE Limited pursuant to Regulation 31 with two days of delay.	Rs. 4000/-	We have been informed that due to some technical issues at BSE's platform, the said shareholding pattern appears to have been filed with a delay of two days on BSE website. The Company has brought this matter before BSE and representations are made, a response on which is awaited from BSE. We have verified this fact during our audit and found the same in order.

Dinesh Joshi



As there were no observations made in the previous reports, the listed entity was not required to carry out 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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

Place: Pune
Date: 26.06.2020

Dinesh Joshi



Dinesh Joshi
Designated Partner,
KANJ & CO. LLP,
FCS No: 3752
C P No: 2246
UDIN: F003752B000386145