



GOKUL

Gokul Refoils & Solvent Ltd.

Corporate Office :
"Gokul House", 43 Shreemali Co-op. Housing Society Ltd.
Opp. Shikhar Building, Navrangpura,
Ahmedabad-380 009. Gujarat (India)
Ph. : +91-79-66304555, 66615253/54/55
Fax : +91-79-66304543 Email : grsl@gokulgroup.com
CIN : L15142GJ1992PLC018745

May 27, 2021

To,
Dept. of Corporate Services,
BSE Ltd.
25th Floor, Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai – 400 001
Company Code 532980

To,
National Stock Exchange of India Ltd.
Exchange Plaza,
Plot no. C/I. G Block,
Bandra-Kurla Complex,
Bandra (E) Mumbai - 400 051
Company Code GOKULEQ

Dear Sir/ Madam,

Ref: Regulation 24A of SEBI (LODR) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2021

Please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by Yash Mehta & Associates, Company Secretaries in Practice, for the Financial Year ended March 31, 2021.

Kindly take the same on your record.

Thanking You

Yours truly,
For, Gokul Refoils & Solvent Ltd.

Abhinav Mathur
Company Secretary & Compliance Officer



YASH MEHTA & ASSOCIATES
Company Secretaries

9913069848 079-40370062
yash.ymassociates@gmail.com

Regd. Add. : 34/401, Raghukul Apt.,
Solaroad, Naranpura,
Ahmedabad - 380063

SECRETARIAL COMPLIANCE REPORT
GOKUL REFOILS AND SOLVENT LIMITED
FOR THE YEAR ENDED ON 31ST MARCH, 2021

To,
Board of Directors
GOKUL REFOILS AND SOLVENT LIMITED
CIN: L15142GJ1992PLC018745
State Highway No 41,
Nr. Sujanpura Patia,
Sidhpur, Gujarat -384151, India.

We, M/s. Yash Mehta and Associates, Practicing Company Secretaries have examined:

- 1) all the documents and records made available to us and explanation provided by Gokul Refoils And Solvent Limited — CIN L15142GJ1992PLC018745 ("the listed entity"),
- 2) the filings/ submissions made by the listed entity to the stock exchanges,
- 3) website of the listed entity,
- 4) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2021 ("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 for the financial year ended 31.03.2021 ("Review Period"), have been examined, and include:

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

The listed entity has complied with filing of required documents under various regulations, to the extent applicable to the Company, during the year under review.





- 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;

During the review period, disclosures under Regulation 29(1) and 29(2), were filed with the Stock Exchange within due course of time for change in share capital of the Promoter and Promoter Group consequent upon tendering of equity shares and acceptance thereof by the listed entity for extinguishment under Buy-Back Offer by the Company.

The listed entity has also complied with filing of Annual Disclosures under Regulation 30(1) and 30(2) of the said Regulations for the year under review.

- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

During the year under review, the Company has submitted various disclosures to Stock Exchange and Board with respect to buy-back of 3,29,00,000 equity shares of the Company at a price of Rs. 12/- per share, to the extent applicable.

- 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;

The listed entity has closed Trading window from time to time as required under the said regulations during the year under review.

During the year under review, the Company has also received declaration under Regulation 7(1)(b) from the Director appointed and Disclosures under Regulation 7(2) of the said Regulations pursuant to change in shareholding of Promoter/Promoter Group from time to time.





YASH MEHTA & ASSOCIATES
Company Secretaries

- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

However, regulations mentioned above under clause (e) (f) & (g) are not applicable to the Company during the review period; and based on the examination of documents/information received electronically, we hereby report that, during the Review Period;

- I. The listed entity has generally complied with all the material provisions of the above applicable Regulations and circulars/ guidelines issued thereunder.
- II. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.
- III. The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.
- IV. As per the information given by the Management and concerned person, no actions has been taken against the Company/its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges, under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- V. No observation has been issued on the listed entity in the previous report and so compliance on the observation will not apply to the listed entity.

Date : 26.05.2021
Place : Ahmedabad



Yash J. Mehta

YASH MEHTA
PROPRIETOR
FOR YASH MEHTA & ASSOCIATES
COMPANY SECRETARIES
ACS No.: 45267 C. P. No.: 16535
PEER REVIEW NUMBER: 1269/2021
UDIN: A045267C000374046