

**Date: 23<sup>rd</sup> May, 2019**

**CNPCL/SE/2019/05/02**

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

To,  
National Stock Exchange India Limited  
The Manager,  
Exchange Plaza, Plot No. C/1, G Block  
Bandra-Kurla Complex, Bandra (E)  
Mumbai – 400051  
Maharashtra  
**Ref. : Symbol: CNOVAPETRO**

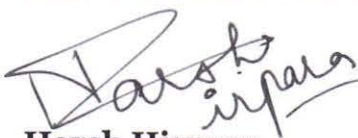
**Sub: Submission of Annual Secretarial Compliance Report for year ended March 31, 2019**

Sir/Madam,

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015, the Annual Secretarial Compliance Report for the year ended March 31, 2019, 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 31<sup>ST</sup> MARCH, 2019**

I, Jatin Harihsbhai 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;
- (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, 2019 ("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;

  
  
K. Jatin & Co.  
Company Secretaries

- (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 - **Not Applicable during the year under reviewed;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not Applicable during the year under reviewed;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable during the year under reviewed;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not Applicable during the year under reviewed;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 - **Not Applicable during the year under reviewed;**

and circulars/ guidelines issued thereunder; 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.
- (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 action initiated 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.

  
K. Jatin & Co.  
Chartered Accountants  
Company Secretaries

- (d) This is first Secretarial Compliance report, hence No action required to take by the listed entity to comply with the observations made in previous reports as this report.

K. JATIN & Co.,  
(Company Secretary)  
(UCN: S2017GJ508600)

PLACE: Ahmedabad  
DATE: 21<sup>st</sup> May, 2019

  
*Jatin H. Kapadia*  
per Jatin Kapadia  
Company Secretary  
COP: 12043