

July 27, 2020

To,

BSE LIMITED P.J. Towers, Dalal Street, Mumbai – 400 001 BSE Scrip Code: 532684	National Stock Exchange of India Ltd Exchange Plaza, Bandra Kurla Complex, Bandra East, Mumbai – 400 051 NSE Symbol: EKC NSE Series: EQ
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Dear Sir/Madam,

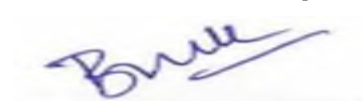
Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI circular CIR/CFD/CMD1/27 /2019 dated February 8, 2019, we are forwarding herewith the Annual Secretarial Compliance Report for the financial year 2019-2020.

You are requested to kindly take the above information on record.

Thanking you,

For **Everest Kanto Cylinder Limited**



Bhagyashree Kanekar
Company Secretary & Compliance Officer



**EVEREST
KANTO
CYLINDER
LIMITED**

**Manufacturers
of High Pressure
Seamless
Gas Cylinders**

Registered Office :
204, Raheja Centre,
Free Press Journal Marg,
214, Nariman Point,
Mumbai - 400 021.

CIN L29200MH1978PLC020434

Tel. : +91-22-4926 8300 / 01

Fax : +91-22-2287 0720

Website : www.everestkanto.com





AASHISH K. BHATT & ASSOCIATES

Practicing Company Secretaries

Aashish K. Bhatt
B.Com., A.C.S., PGDSL

SECRETARIAL COMPLIANCE REPORT OF
EVEREST KANTO CYLINDER LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019]

To,
Everest Kanto Cylinder Limited,
204, Raheja Centre, Free Press Journal Marg,
214, Nariman Point Mumbai – 400021.

I, have examined:

- a) all the documents and records made available to us and explanation provided by Everest Kanto Cylinder Limited (“the listed entity”),
- a) the filings / submissions made by the listed entity to the stock exchanges,
- b) 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 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:-



D / 101, Lata Annexe, Above Axis Bank, W. E. Highway, Borivali (East), Mumbai - 400 066.

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

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, 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
1.	Pursuant to regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall submit financial results to stock exchange within forty five days of end of each quarter other than last quarter.	The requisite disclosures were made to stock exchange.	Delay in submission of Financial Results for the quarter ended 30 th June, 2019 to respective stock exchange.
2.	Trading of equity shares of the company by designated persons during the period of closure of trading window.		Violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015 for trading by designated persons during the period of closure of trading window. Penalty was levied by company.
3.	Pursuant to regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern on a quarterly basis, within 21 days from the end of each quarter		Delay in submission of Shareholding Pattern for quarter ended 30 th September, 2019 to National Stock Exchange of India Limited (NSE) by one day, which was on account of the technical reasons while punching data on NEAPS platform. After a rigorous follow up and communications, the issue was resolved by NSE and the Company was able to upload the Shareholding Pattern on 22 nd October, 2019.



- 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.
1.	National Stock Exchange of India Limited and BSE Limited	Delay in submission of Financial Results for the quarter ended 30 th June, 2019 to respective stock exchange. (Pursuant to regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall submit financial results to stock exchange within forty five days of end of each quarter other than last quarter)	Stock Exchanges informed the Company, the amount of fine that was required to be paid in terms of circular No. SEBI / HO / CFD / CMD / CIR / P / 2018 / 77 dated 3 rd May, 2018 for which Company has paid the fine.	Delay in submission of Financial Results for the quarter ended 30 th June, 2019 to respective stock exchange.

- 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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Nil	Nil	Nil	Nil

On account of pandemic "COVID 2019" and nationwide lockdown imposed by governments, the audit process has been modified, wherein certain documents/records etc. were verified in electronic mode and have relied on the representations received from the Company for its accuracy and authenticity.

For Aashish K. Bhatt & Associates
Company Secretaries

Place: Mumbai
Date: 23.07.2020



Aashish Bhatt

Aashish Bhatt
Proprietor

ACS No.: 19639, COP No.: 7023
UDIN: A019639B000493301