## TIDE WATER OIL CO. (INDIA) LTD.

Regd. Office: Yule House | 8, Dr. Rajendra Prasad Sarani | Kolkata 700 001

Tel: 033 2242 1086 | Fax: 033 2242 1087 | E-mail: tidecal@tidewaterindia.co.in | www.tidewaterindia.com

CIN: L23209WB1921PLC004357

An ISO 9001: 2015 Company

Date: 24th June, 2020

National Stock Exchange of India Ltd.

(Scrip ID - TIDEWATER)

Exchange Plaza,

Plot No. C/1, Block - G,

Bandra-Kurla Complex, Bandra (E)

Mumbai - 400051

Fax No. (022) 2659 8237 / 8238 / 66418124 / 8125

BSE Limited

(Scrip Code - 590005)

(Formerly Bombay Stock Exchange Ltd.) Floor 25, P.J. Towers,

Dalal Street,

Mumbai - 400001

Fax No. (022) 2272 3353

Dear Sir(s),

## Sub.: Submission of Annual Secretarial Compliance Report for the financial year 2019-20.

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Tide Water Oil Company (India) Ltd. issued by Manoj Shaw & Co., Practising Company Secretaries, for the financial year 2019-20.

This is for your information and record.

Thanking you,

Yours faithfully,

For Tide Water Oil Co. (India) Ltd.

(S. Ganguli)

Company Secretary

Encl.: As above.





"PODDAR COURT" 18, Rabindra Sarani Gate no. 1, 3rd Floor, Room No. 331, Kolkata - 700001

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E-mail: shawmanoj2003@gmail.com shawmanoj2003@yahoo.co.in

## Secretarial Compliance Report of Tide Water Oil Co India Ltd for the year ended 31/03/2020

We, Manoj Shaw & Co, Company Secretaries, having our office at "Poddar Court" 18, Rabindra Sarani, Gate no. 1, 3rd Floor, Room No. 331, Kolkata-700001, have examined:

- (a) all the documents and records made available to us and explanation provided by Tide Water Oil Co India Ltd (" the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stockexchanges,
- (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 31/03/2020 ("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 there\_under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there\_under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there\_under, 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, 2009 (till November 09, 2018);
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (w.e.f. November 10, 2018);

- (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the Company during the Audit Period).
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the Audit Period).
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares)Regulations,2013; (Not applicable to the Company during the Audit Period).
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

and based on the above examination, we hereby report that, during the Review Period:

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under including but not limited to requirement as stated under para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 as issued by Securities and Exchange Board of India, except in respect of matters specified below:-

| Sr.No | Compliance Requirement    | Deviations | Observations |  |  |
|-------|---------------------------|------------|--------------|--|--|
|       | (Regulations/ circulars / |            | / Remarks    |  |  |
|       | guidelines including      |            | ofthe        |  |  |
|       | specific clause)          |            | Practicing   |  |  |
|       |                           |            | Company      |  |  |
|       |                           |            | Secretary    |  |  |
| Ni1   |                           |            |              |  |  |

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it

(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 issuedthere under:

| Sr.<br>No. | Action taken by | Details of violation | Details of action taken E.g. fines, warning letter, debarment, | Observations/ remarks of the Practicing Company Secretary, if any. |  |  |
|------------|-----------------|----------------------|--|--|--|--|
|            |                 |                      | debarment,   |  |  |  |
|            |                 |                      | etc.   |  |  |  |
|            | Nil             |                      |  |  |  |  |

(a) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. | Observations | Observations      | Actions    | Comments of    |  |  |
|-----|--------------|-------------------|------------|----------------|--|--|
| No. | of the       | made in the       | taken by   | the Practicing |  |  |
|     | Practicing   | secretarial       | the listed | Company        |  |  |
|     | Company      | compliance report | entity, if | Secretary on   |  |  |
|     | Secretary in | for the year      | any        | the actions    |  |  |
|     | the previous | ended             |            | taken by the   |  |  |
|     | reports      | (The years are    |            | listed entity  |  |  |
|     |              | to be             |            |                |  |  |
|     |              | mentioned)        |            |                |  |  |
| NA  |              |                   |            |                |  |  |

Place: Kolkata

Date: 24.06.2020

For M/s Manoj Shaw & Co. (Company Secretaries)

Manoj Prasad Shaw (Proprietor)

FCS No. 5517; C P No.: 4194 UDIN: F005517B000374765