May 29, 2019

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

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2019.

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 2018-19.

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

Thanking you,

For Everest Kanto Cylinder Limited

N

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. : +91-22-3026 8300 / 01 Fax : +91-22-2287 0720

Website : www.everstkanto.com







B.Com, A.C.S., PGDSL

AASHISH K. BHATT & ASSOCIATES

Practising Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF EVEREST KANTO CYLINDER LIMITED FOR THE YEAR ENDED 31ST MARCH, 2019

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

- I, Aashish K. Bhatt & Associates, Company Secretaries in Practice 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, 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;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosing Requirement Regulations, 2018 – Not Applicable;
 MUMBAI

D/101, Lata Annexe, Above Axis Bank, W.E. Highway, Borivali (East), Mumbai-400 066. Mob. : 98671 51081 • Telefax : 022-2846 1715 • E-mail: mail@aashishbhatt.in

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- 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:

1. SEBI Circular dated September 24, 2015 - Format for compliance report on Corporate Governance to be submitted to Stock Exchange (s) by Listed Entities;

and based on the above examination, we 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. | Compliance | Requirement | Deviations | Observations/ Remarks of the | |
|-----|---|-------------|------------|-------------------------------------|---------|
| No. | No. (Regulations/ circulars / guidelines including specific clause) | | | Practicing | Company |
| | | | | Secretary | |
| | Nil | | Nil | Nil | |



- 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 | Details of | Details of action taken | Observations/ remarks of | |
|---------|----------|------------|--|--|--|
| | taken by | violation | E.g. fines, warning letter, debarment, etc. | the Practicing Company Secretary, if any. | |
| | NA | NA | NA | NA | |

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

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

Place: Mumbai Date: 29.05.2019

For Aashish K. Bhatt & Associates BHATTA **Company Secretaries** aus MUMBA **Aashish Bhatt** Proprietor SECRACS No.: 19639, COP No.: 7023