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## DEVESH PATHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES  
REGD. INSOLVENCY PROFESSIONAL  
REGD. TRADE MARKS AGENT

FIRST FLOOR, 51, UDYOGNAGAR SOCIETY,  
NEAR AYURVEDIC COLLEGE. OUTSIDE PANIGATE,  
VADODARA-390 019

### **Secretarial compliance report of INEOS STYROLUTION INDIA LIMITED for the year ended 31.03.2020**

We, Devesh Pathak & Associates, Practising Company Secretaries have examined:

- (a) all the documents and records made available to us (electronically only in view of COVID-19 due to lockdown) and explanation provided by INEOS STYROLUTION INDIA LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,

for the year ended 31<sup>st</sup> 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:-

- (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;
- (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;
- (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;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;





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

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

1. The Company has not issued any securities and accordingly:

- The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and
- The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014
- The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008
- Securities and Exchange Board of India (Issue and listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013

were not applicable.

2. The Company has not bought back any security of the Company and accordingly the Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 was not applicable.

- (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
-	NA	NA	NA

- (b) 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 our 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:





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Continuation Sheet.....

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.
-	NA	NA	NA	NA

3. 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...(The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Place: Vadodara

Date: 18<sup>th</sup> June, 2020



For Devesh Pathak & Associates

CS Devesh A. Pathak

FCS No.: 4559

CP No.: 2306

UDIN: F004559B000353248

