



**THE ANDHRA  
PETROCHEMICALS LIMITED**

Regd. Office :  
VENKATARAYAPURAM  
(Tanuku) - 534 215  
West Godavari Dist. (A.P.)  
Tel : 08819-224075, 224755, 224911 (7 Lines)  
Fax : 08819-224168  
E-mail : info.tnk@andhrapetrochemicals.com  
CIN : L23209AP1984PLC004635  
Website : www.andhrapetrochemicals.com

No.APL/SEC/BSE/SCR 2019-20/

Manager,  
Listing Compliance  
Bombay Stock Exchange Ltd.,  
25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai 400001

21 July 2020

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020.

Ref: Scrip code: 500012

\* \* \*

We enclose herewith the Annual Secretarial Compliance Report of our Company, The Andhra Petrochemicals Ltd., for the year ended 31<sup>st</sup> March, 2020 issued by Nekkanti S R V V S Narayana & Co., Practising Company Secretaries.

We request you to kindly take the same on record.

Thanking you,

Yours faithfully,  
for **THE ANDHRA PETROCHEMICALS LIMITED,**

**(M V V S V Prasadu)**  
**Dy. Secretary & Asst. Manager (Finance)**

Encls: As above.

**SECRETARIAL COMPLIANCE REPORT OF M/S. THE ANDHRA PETROCHEMICALS LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

We have examined:

- all the documents and records made available to us and explanation provided by M/s. The Andhra Petrochemicals Limited having CIN L23209AP1984PLC004635 and having registered office at Venkatrayapuram, Tanuku, West Godavari District, Andhra Pradesh - 534215 ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document / filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

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 thereunder.
- The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.



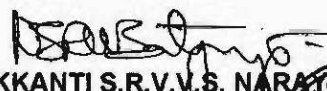
- (c) The following are the details of actions taken against the listed entity / its promoters/ directors / material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts / Regulations and circulars / guidelines issued thereunder:


Sl. No.	Action taken by	Details of Non-adherence	Details of action taken e.g. fines, warning letter, debarment etc.	Observations / Remarks
1	Bombay Stock Exchange	The Listed Entity has complied with SEBI (LODR), Regulations, 2015 with regard to Composition of	Rs.1,18,000 plus GST of Rs.21,240. Total fine payable is Rs.1,39,240/-	The Listed entity has explained to us that there was no violation of SEBI (LODR), Regulations, 2015 with regard to Composition of Audit Committee. However as per the guidelines of BSE any fraction shall be rounded off to the higher Number. But the Listed Entity as per the normal rounding off practice rounded off the lower number since the fraction was working out to less than 0.5 (i.e. 3.3). In this regard it was further informed to us that the Listed Entity has made a representation to Stock Exchange citing a case "Toubro Infotech and Industries" wherein Securities Appellate Tribunal has given ruling that non-adherence to guidelines is not punitive.
2	Bombay Stock Exchange	Audit Committee. However as per the Exchange intimation to the Company the guidelines with regard to rounding off was not adhered to.	Rs.64,000 plus GST of Rs.11,520. Total fine payable is Rs.75,520/-	

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

Sl. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Not applicable	The Listed Entity has failed to submit information regarding loss of share certificates and issue of duplicate share certificates to the stock exchange pursuant to Regulation 39(3) of LODR	The Listed Entity has advised the RTA to inform the Listed Entity to enable to inform the Stock Exchange	Nil

For NEKKANTI S.R.V.V.S. NARAYANA & CO.  
Company Secretaries

  
(NEKKANTI S.R.V.V.S. NARAYANA & CO.)  
Proprietor  
M.No.F7157, C.P.No.7839



Date : 20<sup>th</sup> June, 2020  
Place : Venkatarayapuram, Tanuku  
UDIN : F007157B000378275