

**PANKAJ & ASSOCIATES**  
Company Secretaries

Office: - 505/ Panchsheel-4/B  
Raheja Township,  
Malad (East),  
Mumbai-400 097,  
Tel Off: - 7208057109  
Cell:- 9322298917  
E-Mail: [shirdipankaj@hotmail.com](mailto:shirdipankaj@hotmail.com)

**Pankaj S Desai**  
B.Com (Hons), A.C.S., A.C.A.  
PAN :- AADPD1728R

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**Annex-A**

**Secretarial compliance report of KESAR PETROPRODUCTS LTD. for the year ended 31<sup>st</sup> March, 2019.**

I have examined:

- (a) all the documents and records made available to us and explanation provided by **KESAR PETROPRODUCTS LTD.** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (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<sup>st</sup> March, 2019 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) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018- **(No instances for compliance requirements during the year);**
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- **(No instances for compliance requirements during the year);**
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- **(No instances for compliance requirements during the year);**



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(h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013 (No instances for compliance requirements during the year);

(i) 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
Not Applicable			

(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/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:

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.
Not Applicable				



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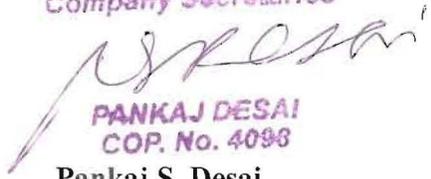
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d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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

For PANKAJ & ASSOCIATES  
Company Secretaries

Not Applicable

  
PANKAJ DESAI  
COP. No. 4098

**Pankaj S. Desai**  
Practicing Company Secretary:  
ACS No.: 3398  
C. P. No.: 4098



Place: Mumbai  
Date: 27.05.2019