



KESAR PETROPRODUCTS LIMITED

404, Naman Centre, C-31/G Block, BKC, Bandra (E), Mumbai - 400 051.

Tel: (022) 40424100 • URL - www.kesarpetroproducts.com

Date: 31.07.2020

To,
The Manager,
Listing Department,
BSE Limited
PhirozeJeeJeebhoy Tower,
Dalal Street, Fort
Mumbai- 400 001

Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
Ref: Scrip Id - 524174

Dear Sir(s),

Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith the Secretarial Compliance Report duly issued by Mr. Pankaj Desai, Practicing Company Secretary, for the financial year ended 31st March, 2020.

Kindly take the above in your records.

Thanking You.

Yours Faithfully,

For KESAR PETROPRODUCTS LIMITED

mohit k.
MOHIT KAUSHIK
EXECUTIVE DIRECTOR AND CEO
DIN: 06463483

PANKAJ & ASSOCIATES

Company Secretaries

Pankaj S Desai

B.Com (Hons), A.C.S., A.C.A.

PAN :- AADPD1728R

Office: - 505 / Panchsheel-4/B

Raheja Township,

Malad (East),

Mumbai-400 097,

Tel Off: - 7208057109

Cell:- 9322298917

E-Mail: shirdipankaj@hotmail.com

Secretarial compliance report of KESAR PETROPRODUCTS LTD. for the year ended 31st March, 2020.

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 31st March,2020 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**);
- (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**);

PANKAJ & ASSOCIATES**Company Secretaries****Pankaj S Desai****B.Com (Hons), A.C.S., A.C.A.****PAN :- AADPD1728R****Office: - 505 / Panchsheel-4/B****Raheja Township,****Malad (East),****Mumbai-400 097,****Tel Off: - 7208057109****Cell:- 9322298917****E-Mail: shirdipankaj@hotmail.com**

(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
1.	Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company does not updated website with required information	Corrective action should be taken by company immediately
2.	{SEBI (LODR) REG} – by BSE	The Company's non-compliance reg. appointment of Company Secretary (in part)	The Company has paid the fine to BSE as confirmed by the management.

(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:

PANKAJ & ASSOCIATES**Company Secretaries****Pankaj S Desai****B.Com (Hons), A.C.S., A.C.A.****PAN :- AADPD1728R****Office: - 505/ Panchsheel-4/B****Raheja Township,****Malad (East),****Mumbai-400 097,****Tel Off: - 7208057109****Cell:- 9322298917****E-Mail: shirdipankaj@hotmail.com**

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.
1.	BSE LTD	The company has submitted Statement of Investor complaints) for the quarter ended September 2019 after due date as per the the provisions of Regulation 13(3) SEBI (LODR) Regulations.	BSE Ltd has imposed a Fine of Rs. 1180/-	The Company has paid the fine to BSE as confirmed by the management.
2.	SEBI	The non-compliance of the SAST Regulations, by its Order dated 9th March, 2020As per order number: WTM/GM/CFD/77/2019– 20.	Shreyas Dinesh Sharma [PAN:BHDPS9985D], Shruti Dinesh Sharma [PAN:DRKPS7975C], Dinesh Sharma [PAN:ABIPS9306E], Dinesh Sharma HUF [PAN:AAFHD3451H] and Shankarlal Sharma [PAN: AHZPS4363E] shall not access the securities market or buy, sell or otherwise deal in the securities market, either directly or indirectly for a period of one year from the date of this Order.	
3.	SEBI	Notice for his violations Penal Provisions 1. Section 23E of	Imposed a penalty of Rs. 9,50,000 (Rs. Nine Lakh Fifty Thousand	The Company and the said persons have

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	<p>SCR Act 2. Section 23H of SCR Act 3. Section 15HB of SEBI Act Vide ADJUDICATION ORDER NO: Order/KS/VC/2019-20/6662)</p>	only)	informed that they are filing an appeal before the Securities Appellate Tribunal.
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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
Not Applicable				

For Pankaj & Associates**Name of Practicing Company Secretary: Pankaj S. Desai****ACS No.: 3398****C. P. No.: 4098****UDIN: A003398B000523819****Place: Mumbai****Date: 30.07.2020**