

Ref: Secy/NSE

25th June 2020

The Manager
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block-G
Bandra-Kurla Complex, Bandra(E)
Mumbai – 400 051

Dear Sir,

Sub: Submission of Secretarial Compliance Report under
Reg. 24 A of SEBI (LODR) Regulations, 2015

Please find the attached the Secretarial Compliance Report dt. 24th June 2020 for the year ended 31st March 2020 issued by M/s. B Chandra, Practising Company Secretary ACS No. 20879 / CP No. 7859, pursuant to Reg. 24 A of SEBI (LODR) Regulations, 2015.

We request you kindly to take on record the Report.

Thanking you,

Yours faithfully,

For Southern Petrochemical
Industries Corporation Ltd.



M B Ganesh
Secretary

Encl: as above

**Secretarial compliance report of
SOUTHERN PETROCHEMICAL INDUSTRIES CORPORATION LIMITED
(CIN L11101TN1969PLC005778)
for the year ended 31.03.2020**

I B Chandra, Practising company secretary, CP no 7859, having my office at AG3, Ragamalika, 26 Kumaran Colony Main Road, Vadapalani, Chennai 600 026, have examined:

- (a) all the documents and records made available to us and explanation provided by Southern Petrochemical Industries Corporation Limited, CIN L11101TN1969PLC005778 (“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 31.03.2020 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 (SEBI LODR);
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (SEBI SAST);
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT);

and circulars/ guidelines issued thereunder;

I am informed that the company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms/ returns under:

- a. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018
- b. The Securities and Exchange Board of India (Issue and Listing of Debt securities) Regulations 2008
- c. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and
- d. The Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018;

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 except that clarification was given by the company to NSE on delayed reporting of proceeding of Annual General Meeting of the company during the year under review

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary

(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
NIL				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not applicable.

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

The listed entity has complied with clause 6(A) and 6(B) of SEBI circular no CIR/CFD/CMD1/114/2019 dated 18.10.2019

CHANDRA
BALASUBRAMANIAN

Digitally signed by CHANDRA
BALASUBRAMANIAN
Date: 2020.06.24 16:10:28
+05'30'

Place: Chennai
Date: 24.6.2020

Signature:
Practicing Company Secretary : B CHANDRA
ACS/ FCS No.: 20879
C P No.: 7859
UDIN A020879B000372076