

ASHOKA REFINERIES LIMITED

Reg. Off: 501, Wallfort Ozone, Fafadih, Raipur (Chhattisgarh) 492001

PH-07714036578 FAX – 0771-4030947

CIN NO: L15143CT1991PLC006678

www.ashokarefineries.com

Email: arlraipur@yahoo.com

29th May, 2020

BY LISTING PORTAL

Department of Corporate Services,
Bombay Stock Exchange Ltd
P. J. Towers, 25th Floor,
Dalal Street,
Mumbai (Maharashtra) 400 001

Dear Sir/Madam,

SUBMISSION IN TERMS OF REGULATION 24 (A) SEBI (LODR) REGULATION, 2015

We are submitting herewith **Annual Secretarial Compliance Report** for the financial year 2019-20 received by us from the auditor in terms of above mentioned regulation.

Kindly take the submission on records.

Yours faithfully,
For, Ashoka Refineries Limited



(Ruppal Padhiar)
Company Secretary & Compliance Officer

Enclosure: As stated above

SATISH BATRA & ASSOCIATES LLP

COMPANY SECRETARIES

2nd floor, Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C. G.)

To
The Board of Directors,
Ashoka Refineries Limited,
501, Wallfort Ozone, Fafadih,
Raipur (C.G.) 492001

Dear Sir,

ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR 2019-20

We have been engaged by **Ashoka Refineries Limited** (hereinafter referred to as 'the Company') bearing **CIN: L15143CT1991PLC006678** whose equity shares are listed on **Bombay Stock Exchange Limited (Security Code: 526983)** to conduct an audit in terms of Regulations 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circular/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circular/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance note on Annual Secretarial Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.


(Satish Kumar Batra)

CP No.: 2875
FCS No.:1316



Date: 19th May, 2020
Place: Raipur
UDIN: F001316B000254646

SATISH BATRA & ASSOCIATES

COMPANY SECRETARIES

2nd floor, Ashoka Plaza, Ashoka Ratan,
Vidhan Sabha Marg, Shankar Nagar,
Raipur 492007 (C. G.)

SECRETARIAL COMPLIANCE REPORT

OF

ASHOKA REFINERIES LIMITED (CIN: L15143CT1991PLC006678)

FOR THE YEAR ENDED 31ST MARCH, 2020

We have examined that:

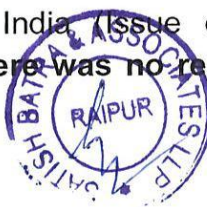
- (a) all the documents and records made available to us and explanation provided by **Ashoka Refineries Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the Stock Exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2020 ("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; **[There was no reportable event during the period under review];**



- (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; **[There was no reportable event during the period under review];**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[There was no reportable event during the period under review];**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not Applicable as the Company has not issued any debt securities];**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not Applicable as the Company has not issued any Non- Convertible and Redeemable Preference Shares];**
- (h) 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:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder,
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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:

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



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

Sr. No.	Observations of Practising Company Secretary	Observations made in Secretarial Compliance Report for the year ended on 31.03.2019	Details of action taken by listed entity (if any)	Comments of Practising Company Secretary, on actions taken by listed entity
	NA	NA	NA	NA

NOTE:

There was no physical search made by us while preparing this report due to the ongoing lockdown imposed to prevent the spread of pandemic COVID-19 virus but the Company has provided a online support for preparing this report and we have verified the documents online and also kept the same for our records.

I hereby affirm that this report is being issued after an online search and verification of all documents and records of the Company.

For Satish Batra & Associates LLP
Company Secretaries



Satish Kumar Batra
Designated Partner

FCS No.: 1316

C P No.: 2875

UDIN: F001316B000254646

Place: Raipur

Date: 19th May, 2020.