



National Peroxide Limited

(ISO 9001 = ISO 14001 OHSAS 18001 = ISO 50001 RC 14001)

REGISTERED OFFICE : NEVILLE HOUSE, J. N. HEREDIA MARG, BALLARD ESTATE, MUMBAI - 400 001.

Tel. : 2261 8071 (7 LINES), FAX : 2266 5966, STD/ISD CODE : 022/9122, E-mail : npl@naperol.com, website : www.naperol.com

Corporate Identification No. : L24299MH1954PLC009254

May 28, 2019

BSE Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street
Fort, Mumbai 400 001

(Scrip Code – 500298)

**Sub: Annual Secretarial Compliance Report
for the year ended 31st March, 2019**

Dear Sirs,

In Compliance with SEBI Circular No.: CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed copy of Annual Secretarial Compliance report dated May 28, 2019 for the financial year 2018 -19 issued by M/s. Parikh & Associates, Practicing Company Secretaries and Secretarial Auditors of the Company.

Kindly take the same on record.

Thanking you,

Yours faithfully,
For National Peroxide Limited

Chandukumar Parmar
Company Secretary

Encl: a. a.

All correspondence to be addressed to :

Head Office : C-1, Wadia International Centre, Pandurang Budhkar Marg, Worli, Mumbai - 400 025.

Tel. : 022-66620000 • Fax : 022-66193421 • Email : npl@naperol.com

Secretarial Compliance Report of National Peroxide Limited for the year ended 31st March, 2019

To,
National Peroxide Limited
Neville House, J N Herdia Road,
Ballard Estate,
Mumbai - 400001

We Parikh & Associates have examined:

- a) all the documents and records made available to us and explanation provided by National Peroxide 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, 2019 ("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; (Not applicable to the company during the review period)
- 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; (Not applicable to the company during the review period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the company during the review period)



- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the company during the review period)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the company during the review period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; 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, 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

- 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.



- 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 (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
Not Applicable				



For Parikh & Associates

Place: Mumbai

Date: May 28, 2019

Signature:

Name of the Practicing Company Secretary: Shalini Bhat
FCS No.: 6484 CP No.: 6994