

The Manager BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, <b>MUMBAI - 400 001</b> <b>Scrip Code : 532234</b>	The Manager Listing Department National Stock Exchange of India Ltd., Exchange Plaza, Bandra-Kurla Complex, Bandra East, <b>MUMBAI - 400 051</b> <b>Symbol : NATIONALUM</b>
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**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2019.**

**विषय:** 31.03.2019 को समाप्त वर्ष के लिए वार्षिक सचिवीय अनुपालन रिपोर्ट.

Dear Sir/ महोदय,

With Reference to the SEBI Circular CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) (Amendment) Regulations, 2018 relating to the above mentioned subject, please find enclosed herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2019 issued by M/s Deba Mohapatra & Co., Company Secretaries, Bhubaneswar.

This is for your information and record/ आपकी जानकारी और अभिलेख हेतु.

Thanking you/ धन्यवाद,

Yours faithfully/भवदीय,  
for **National Aluminium Co. Ltd.**  
कृते नेशनल एल्यूमिनियम कंपनी लिमिटेड



(N. K. Mohanty)

एन.के. महान्ति

**Company Secretary and Compliance Officer**  
कंपनी सचिव और अनुपालन अधिकारी

**नेशनल एल्यूमिनियम कम्पनी लिमिटेड**  
(भारत सरकार का उद्यम)  
**निगम कार्यालय**  
नालको भवन, नयापल्ली, भुवनेश्वर - 751 013 भारत

National Aluminium Company Limited  
(A Government of India Enterprise)  
**REGD. & CORPORATE OFFICE**  
Nalco Bhawan, Nayapalli, Bhubaneswar-751013, India

CIN # L27203OR1981GOI000920

Tel.:0674-2301988-999, Ext.:2265, 2266, 2267, 2585, 2587, E-mail:company\_secretary@nalcoindia.co.in,Website:www.nalcoindia.com

**Secretarial Compliance Report of  
“National Aluminium Company Limited”  
for the year ended 31.03.2019.**

We, M/s Deba Mohapatra & Co have examined:

- (a) all the documents and records made available to us and explanation provided by of National Aluminium Company 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 31.03.2019 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, as amended;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable during the period under report.**



- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable during the period under report**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the period under report**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the period under report**
- (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, 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.	Non-Compliance as per Regulation 33 and Regulation 97 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations,	Financial Results submitted is not as per	Since, a specific note on the published Annual Accounts for the



	<p>2015 regarding submission of financial results by listed entities for the period ended March 2018 (Vide Letter No. NSE/LIST/FR/6254 Dated 29<sup>th</sup> May 2018)</p>	<p>format prescribed by SEBI</p>	<p>year ended 31.03.2018 missed out inadvertently, a clarification on non-compliance as per Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 was submitted by the Company Vide Letter No. NBC/S/4.5 &amp; 4.5(A)/2018/1000 Dated 31<sup>st</sup> May 2018, to the stock exchanges stating that "The figures for the last quarter are the balancing figures in respect of the full financial year and the unaudited published year-to-date figures upto the third quarter of the current financial year" and with a request to take the same on record by both BSE &amp; NSE.</p>
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(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 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	NIL	NIL	NIL

(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 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA	NA	NA	NA

Place: Bhubaneswar  
Date: 18.05.2019



For DEBA MOHAPATRA & CO  
COMPANY SECRETARIES

*Debadatta Mohapatra*

DEBADATTA MOHAPATRA  
FCS No.: 5474, C P No.: 4583