July 9, 2020

To

BSE Ltd
Phiroze Jeejeebhoy Towers
21st Floor,
Dalal Street
Mumbai 400 001.
Scrip Code: 523 204
Through: BSE Listing Centre

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor
Plot No: C/1 G Block
Bandra – Kurla Complex
Bandra (E), Mumbai 400 051
Symbol: ABAN
Through: NEAPS

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").


Thanking you

Yours trly

For Aban Offshore Limited

S. N. Balaji
Assistant General Manager(Legal) & Secretary

Encl:a/a
SECRETARIAL COMPLIANCE REPORT OF
M/S. ABAN OFFSHORE LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020

1. We have examined:

   (a) all the documents and records made available to us and explanation provided
       by M/s. ABAN OFFSHORE 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");

2. 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) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

(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:-

<table>
<thead>
<tr>
<th>S. No.</th>
<th>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</th>
<th>Deviations</th>
<th>Observations/ Remarks of the Practicing Company Secretary</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NIL</td>
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</table>

(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) No action was 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.
(d) There were no observations made in the previous report, hence reporting on actions to comply with the observations made in previous reports does not arise.

(e) We further certify that the Company has complied with the conditions as mentioned in the serial no. 6(A) and 6(B) of SEBI circular vide no. CIR/CFD/CMD1/114/2019 dated 18th October, 2019, relating to terms and conditions of appointment of statutory auditors of the Company.

Date: 9th July, 2020
Place: Chennai
UDIN: F009687B000430184