



**MANOJ SHAW & CO.**  
COMPANY SECRETARIES

"PODDAR COURT" 18, Rabindra Sarani  
Gate no. 1, 3rd Floor, Room No. 331,  
Kolkata - 700001

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## **Secretarial Compliance Report**

### **of Tide Water Oil Co India Ltd for the year ended 31/03/2021**

We, Manoj Shaw & Co, Company Secretaries, having our office at "Poddar Court" 18, Rabindra Sarani, Gate no.1, 3rd Floor, Room No. 331, Kolkata- 700001, have examined:

- (a) all the documents and records made available to us and explanation provided by Tide Water Oil Co India Ltd (" 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 31/03/2021 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 ;( Not applicable to the Company during the Audit Period).
- (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; (Not applicable to the Company during the Audit 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 Audit Period).
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not applicable to the Company during the Audit Period);

and based on the above examination, we hereby report that, during the Review Period:

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

| <b>Sr.No</b> | <b>Compliance Requirement<br/>(Regulations/ circulars /<br/>guidelines including<br/>specific clause)</b> | <b>Deviations</b> | <b>Observations<br/>/ Remarks<br/>of the<br/>Practicing<br/>Company<br/>Secretary</b> |
|--------------|---|-------------------|---|
| Nil          |   |                   |   |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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 there under:

| <b>Sr. No.</b> | <b>Action taken by</b> | <b>Details of violation</b> | <b>Details of action taken E.g. fines, warning letter, debarment, etc.</b> | <b>Observations/ remarks of the Practicing Company Secretary, if any.</b> |
|----------------|------------------------|-----------------------------|--|---|
| Nil            |                        |                             |  |   |

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

| <b>Sr. No.</b> | <b>Observations of the Practicing Company Secretary in the previous reports</b> | <b>Observations made in the secretarial compliance report for the year ended...<br/>(The years are to be mentioned)</b> | <b>Actions taken by the listed entity, if any</b> | <b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b> |
|----------------|---|---|---|---|
| NA             |   |   |   |   |

Place: Kolkata

Date: 10/06/2021

For M/s Manoj Shaw & Co.  
(Company Secretaries)

MANOJ  
PRASAD SHAW

Digitally signed by  
MANOJ PRASAD SHAW  
Date: 2021.06.10  
16:46:49 +05'30'

Manoj Prasad Shaw  
(Proprietor)

FCS No. 5517; C P No.: 4194

UDIN: **F005517C000437091**

**PEER REVIEW NO: 1243/2021**

