



**Annual Secretarial Compliance Report of
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
For The Year Ended 31.03.2025**

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

D.NO.5/01,Main Road, Jandrapet Chirala,

Prakasam District, Chirala,

Andhra Pradesh, India, 523155.

We K.Srinivasa Rao & Co., Company Secretaries, Guntur have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **COROMANDEL AGRO PRODUCTS AND OILS LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at D.NO.5/01,Main Road, Jandrapet Chirala, Prakasam District, Chirala, Andhra Pradesh, India, 523155.

Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined:

(a) all the documents and records made available to us and explanation provided by **M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED (CIN: L15143TG1975PLC001967)** ("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 31.03.2025 ("Review Period" i.e 01.04.2024 to 31.03.2025) 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 as there was no reportable event during the financial year 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;-**Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:- **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not Applicable as there was no reportable event during the financial year under review**

(j) SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in terms of Para 6(A) and 6(B) of the said circulars on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period of the listed entity - **Not Applicable as there was no reportable event during the financial year under review.**

(k) Other regulations as applicable and circulars/ guidelines issued thereunder;

And based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India, 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	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
-NIL-									

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

Sr.No	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity.	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
-NIL-						



We further affirm the compliance status with respect to the specific provisions by the listed entity as mentioned below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	NIL
2	Adoption and timely Updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	YES YES	NIL
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website 	YES YES YES	NIL
4	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	YES	NIL



5	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NOT APPLICABLE	The Listed entity have no subsidiaries/Material Subsidiaries
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	NIL
7	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	YES	NIL
8	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	YES NOT APPLICABLE	Since, all Related party transactions were entered after obtaining prior approval of audit committee point (b) is not applicable
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	YES	NIL
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	NIL
11	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines	NA	No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars)

	issued thereunder The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column		under SEBI Regulations and circulars/ guidelines issued there under
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with	NA	NIL
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	No additional non- compliance observed for any SEBI regulation/circular/guidance note etc.

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. - NA -

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

Place: Guntur
Date: 28-05-2025

For K.Srinivasa Rao &Co.,
Company Secretaries,



ms
K.Srinivasa Rao
Partner
FCS: 5599 C P No.:5178
P.R.No. 1416/2021
UDIN: F005599G000472661



ANNEXURE

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

D.NO.5/01, Main Road, Jandrapet Chirala,

Prakasam District, Chirala,

Andhra Pradesh, India, 523155.

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) This report is solely for the intended purpose of compliance in terms of Regulation

24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity

Place: Guntur

Date: 28-05-2025



For K.Srinivasa Rao &Co.,
Company Secretaries,

K.Srinivasa Rao
Partner

FCS: 5599 C P No.:5178

UDIN: F005599G000472661



COROMANDEL AGRO PRODUCTS AND OILS LIMITED.,

Factory and Admn. Office : JANDRAPET - 523 165, CHIRALA, A.P., INDIA

Phone : 9849986021

E-mail : capol@capol.in, Website : capol.in

CIN. No. L15143TG1975PLC001967

30 May, 2024

To
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI – 400 001.

Dear Sir / Madam,

Ref: Our Scrip Name : CORAGARO
Our Scrip Code : 507543

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2024.

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the annual Secretarial Compliance Report for the year ended March 31, 2024, issued by M/s. K.Srinivasa Rao & Co., Practicing Company Secretaries, Guntur.

We request you to kindly take the same on record.

Thanking you,

Yours truly,

For Coromandel Agro Products and Oils Limited.

Digitally signed by RADHA
RANI SINGHAL
RADHA RANI SINGHAL
Date: 2024.05.30 19:33:04
+05'30'

(RADHA RANI SINGHAL)
Company Secretary & Compliance Officer

Member Ship No. A68523

Encl: Annual Secretarial Compliance Report



Annual Secretarial Compliance Report
of
M/s Coromandel Agro Products and Oils Limited
For The Year Ended 31.03.2024

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029.

We K.Srinivasa Rao&Co., Company Secretaries, Guntur have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Coromandel Agro Products And Oils Limited (CIN: L15143TG1975PLC001967) ("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 **31.03.2024**.

("Review Period"i.e 01.04.2023 to 31.03.2024) 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 as there was no reportable event during the financial year 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;-**Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not Applicable as there was no reportable event during the financial year under review**

(j) SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in terms of Para 6(A) and 6(B) of the said circulars on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period of the listed entity - **Not Applicable as there was no reportable event during the financial year under review**

(k) Other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India, 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
	NA	NIL	NA

(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 my/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 31.03.2023	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	-NA-	<i>The Company has submitted related party transaction disclosures for the half year ended 30.09.2022 under regulation 23(9) to the stock exchange in pdf mode on 03-11-2022 which is within 15 days from the approval in Board Meeting dated 21-10-2022 and Submitted in XBRL mode on 26-11-2022 with a delay of 11 days.</i>	The Company has paid the fine of Rs.1,12,100/- to the Stock Exchange on 25-01-2023 for Late submission of related party transaction disclosures for the half year ended 30.09.2022 under regulation 23(9) to the stock exchange in XBRL mode.	The Company has paid the fine of Rs.1,12,100/- imposed by the BSE on 25-01-2023 for Late submission of related party transaction disclosures for the half year ended 30.09.2022 under regulation 23(9) to the stock exchange in XBRL mode.



We further affirm the compliance status with respect to the specific provisions by the listed entity as mentioned below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	NIL
2	Adoption and timely Updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	YES YES	NIL
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website 	YES YES NA	NIL NIL Corporate Governance reporting requirements were exempted to the company
4	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	YES	NIL
5	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NOT APPLICABLE	The Listed entity have no subsidiaries/Material Subsidiaries



6	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	NIL
7	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	YES	NIL
8	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	YES NOT APPLICABLE	Since, all Related party transactions were entered after obtaining prior approval of audit committee point (b) is not applicable
9	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder</p>	YES	NIL
10	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	NIL
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder</p>	NA	NIL



12	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.
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This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

Place: Guntur
 Date: 29.05.2024

For K.Srinivasa Rao&Co.,
 Company Secretaries



KSR
 CS. K.Srinivasa Rao
 Partner
 FCS:5599 CP No:5178
PR No: 1416/2021
UDIN:-F005599F000491766



ANNEXURE

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029.

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed, provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes Followed in matters relating to this Report.

6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Guntur

Date: 29.05.2024

For K.Srinivasa Rao & Co.,
Company Secretaries



KSR
CS. K.Srinivasa Rao
Partner
FCS: 5599 CP No: 5178



COROMANDEL AGRO PRODUCTS AND OILS LIMITED.,

Factory and Admn. Office : JANDRAPET - 523 165, CHIRALA, A.P., INDIA

Phone : 9849986021

E-mail : capol@capol.in, Website : capol.in

CIN. No. L15143TG1975PLC001967

27.05.2022

To
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, MUMBAI – 400 001.

Sub: Annual Secretarial Compliance Report for the year ended
March 31, 2022.

Dear Sir / Madam,


Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the annual Secretarial Compliance Report for the year ended March 31, 2022, issued by M/s K.Srinivasa Rao & Co., Practicing Company Secretaries, guntur.

We request you to kindly take the same on record.

Thanking you,

Yours truly,

For Coromandel Agro Products and Oils Limited.


(K. Ramya)

Company Secretary & Compliance Officer
Member Ship No. A35455

Encl: Annual Secretarial Compliance Report



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/s COROMANDEL AGRO
PRODUCTS AND OILS LIMITED
FOR THE YEAR ENDED 31.03.2022**

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029.

We K.Srinivasa Rao & Co, Company Secretaries, Guntur have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED (CIN:L15143TG1975PLC00 1967)**("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 **31.03.2022** ("Review Period" i.e 01.04.2021 to 31.03.2022) 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, 2009(up to 10th November,2018) and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (with effect from 11th November,2018): **Not Applicable as there was no reportable event during the financial year 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;- **Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the covid-19 Pandemic situations, 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 there under, 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.	NA	NA	NA



(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 my/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:

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-				

(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 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-NIL-				

****This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.**

Place: 25.05.2022

Date: Guntur

For K.Srinivasa Rao & Co.,
Company Secretaries

KSR
CS. K.Srinivasa Rao
Partner C P No.:5178

UDIN: F005599D000384868





ANNEXURE

To
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments,
Basheerbagh, Hyderabad- 500029

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made there under and Regulations, circulars and guidelines issued there under by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed there under is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: 25.05.2022

Date: Guntur



For K.Srinivasa Rao & Co.,
Company Secretaries

KS Rao
CS. K.Srinivasa Rao
Partner C P No.:5178

UDIN: F005599D000384868



COROMANDEL AGRO PRODUCTS AND OILS LIMITED.,

Factory and Admn. Office : JANDRAPET - 523 165, CHIRALA, A.P., INDIA

Phone : 91-8594-222683,222681

Fax : 91-8688262007, E-mail : capol@capol.in, Website : capol.in

CIN. No. L15143TG1975PLC001967

29 June, 2021

To
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, MUMBAI – 400 001.

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021.

Dear Sir / Madam,

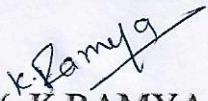
Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the annual Secretarial Compliance Report for the year ended March 31, 2021, issued by M/s K. Srinivasa Rao & Co., Practicing Company Secretaries, Guntur.

We request you to kindly take the same on record.

Thanking you,

Yours truly,

For Coromandel Agro Products and Oils Limited.


(K.RAMYA)

Company Secretary & Compliance Officer
Member Ship No. A35455

Encl: Annual Secretarial Compliance Report



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/s COROMANDEL AGRO
PRODUCTS AND OILS LIMITED
FOR THE YEAR ENDED 31.03.2021**

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029.

We K.Srinivasa Rao & Co, Company Secretaries, Guntur have examined:

(a) all the documents and records made available to us and explanation provided by **M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED (CIN:L15143TG1975PLC001967)** ("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" i.e 01.04.2020 to 31.03.2021) 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, 2009(up to 10th November,2018) and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (with effect from 11th November,2018): **Not Applicable as there was no reportable event during the financial year 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;- **Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the covid-19 Pandemic situations, 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 there under, 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.	NA	NA	NA



(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 my/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:

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-				

(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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-NIL-				

****This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.**

Place: 25.06.2021

Date: Guntur



For K.Srinivasa Rao & Co.,
Company Secretaries

KSR
CS. K.Srinivasa Rao
Partner C P No.:5178

UDIN: F005599C000515097



ANNEXURE

To
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made there under and Regulations, circulars and guidelines issued there under by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed there under is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

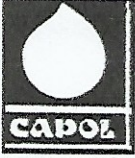
Place: 25.06.2021

Date: Guntur



For K.Srinivasa Rao & Co.,
Company Secretaries

KS
CS. K.Srinivasa Rao
Partner C P No.:5178



COROMANDEL AGRO PRODUCTS AND OILS LIMITED.,

Factory and Admn. Office : JANDRAPET - 523 165, CHIRALA, A.P., INDIA

Phone : 91-8594-222683,222681

Fax : 91-8688262007, E-mail : capol@capol.in, Website : capol.in

CIN. No. L15143TG1975PLC001967

28 JULY, 2020

To
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, MUMBAI – 400 001.

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the annual Secretarial Compliance Report for the year ended March 31, 2020, issued by M/s K.Srinivasa Rao & Co., Practicing Company Secretaries, Guntur.

We request you to kindly take the same on record.

Thanking you,

Yours truly,

For Coromandel Agro Products and Oils Limited.


(K.RAMYA)

Company Secretary & Compliance Officer
Membership no.A35455

Encl: Annual Secretarial Compliance Report



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
FOR THE FINANCIAL YEAR ENDED 31.03.2020**

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029.

We K.Srinivasa Rao & Co, Company Secretaries, Guntur have examined:

(a) all the documents and records made available to us and explanation provided by **M/sCOROMANDEL AGRO PRODUCTS AND OILS LIMITED (CIN:L15143TG1975PLC001967)**("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**31.03.2020** ("Review Period" i.e 01.04.2019 to 31.03.2020) 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 as there was no reportable event during the financial year 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;- **Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) other regulations as applicable 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, in respect of matters specified below:



(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 my/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.
1.	Fine levied by the BSE Ltd under the Standard Operating Procedures issued by SEBI through various circulars	Non-Compliance with requirement to appoint a qualified company secretary as the compliance officer for a period 01.01.2019 to 13.02.2019 which related to the quarter ended 31.03.2019.	Total fine levied as on 14.05.2019Rs. 51,920 (Rupees Fifty One thousand nine hundred Twenty Only) (including GST)	The company has paid the said fine levied by the BSE Ltd. On 27.09.2019, with delay



(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<i>The company has not paid the fine levied by the BSE Ltd for non-appointment of a Whole time Company Secretary under regulation 6 of The SEBI(LODR) Regulations,2015 Instead of paying fine the company makes a request to the BSE Ltd for waiver of the said penalty.</i>	31.03.2019	The company has paid the Fine amount Rs.1,08,560/- to the BSE on 04.12.2019.	Instead of paying fine the company makes a request to the BSE Ltd for waiver of the said penalty, however the BSE Ltd has not accepted the request made by the company and the company has paid the Fine amount Rs.1,08,560/- (including GST) to the BSE Ltd on 04.12.2019.

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

Place: Guntur
Date: 30.06.2020

For K.SrinivasaRao&Co.,
Company Secretaries

USK
CS. K.SrinivasaRao
Partner

FCS:5599 CP No:5178

UDIN:F005599B000407704

ANNEXURE

To
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments, Basheerbagh,
Hyderabad- 500029

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed, provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Guntur
Date: 30.06.2020

For K.SrinivasaRao&Co.,
Company Secretaries

Usil
CS. K.SrinivasaRao
Partner
FCS:5599 CP No:5178
UDIN:F005599B000407704



COROMANDEL AGRO PRODUCTS AND OILS LIMITED.,

Factory and Admn. Office : JANDRAPET - 523 165, CHIRALA, A.P., INDIA

Phone : 91-8594-222683,222684,222686

Fax : 91-8688262007, E-mail : capol@mlgroup.com, Website : capol.in

CIN. No. L15143TG1975PLC001967

29 May 2019

To
The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, MUMBAI – 400 001.

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

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the annual Secretarial Compliance Report for the year ended March 31, 2019, issued by M/s K.Srinivasa Rao & Nagaraju Associates, Practicing Company Secretaries, Vijayawada.

We request you to kindly take the same on record.

Thanking you,

Yours truly,

For Coromandel Agro Products and Oils Limited.


K.RAMYA

Company Secretary & Compliance Officer

Encl: Annual Secretarial Compliance Report



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/s COROMANDEL AGRO
PRODUCTS AND OILS LIMITED
FOR THE YEAR ENDED 31.03.2019**

To

M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED

12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029

We K.Srinivasa Rao & Naga Raju Associates, Company Secretaries, Vijayawada have examined:

(a) all the documents and records made available to us and explanation provided by **M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED (CIN: L15143TG1975PLC001967)** ("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** ("Review Period" i.e 01.04.2018 to 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;



(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009(up to 10th November, 2018) and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (with effect from 11th November,2018): **Not Applicable as there was no reportable event during the financial year 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;- **Not Applicable as there was no reportable event during the financial year under review**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there was no reportable event during the financial year under review**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there was no reportable event during the financial year under review**

(g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations,2013; **Not Applicable as there was no reportable event during the financial year under review**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) other regulations as applicable 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.	Regulation:6(1) of the SEBI(LODR) Regulations,2015 (1) A listed entity shall appoint a qualified company secretary as the compliance officer	The Company has not appointed a qualified company secretary as the compliance officer up to 13th February 2019.	The Company has appointed a qualified company secretary as the compliance officer w.e.f 14 th February 2019

(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 my/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.
1.	Fine levied by the BSE Ltd under the Standard Operating Procedures issued by SEBI through various circulars	Non-Compliance with requirement to appoint a qualified company secretary as the compliance officer	Total fine levied as on 12.02.2019 : Rs.108560/- (One Lakh eight thousand five hundred sixty only) (including GST)	The company has not paid the said fine levied by the BSE Ltd. Instead of paying fine the company makes a request to the BSE Ltd for waiver of the said penalty.



(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable since this report is being issued for the first time and accordingly no action was required to be taken by the company.**

This Report is to be read with our letter of even date annexed herewith and forms an integral part of this Report.

Place: 28.05.2019
Date: Vijayawada

For K.Srinivasa Rao & Naga Raju Associates
Company Secretaries



A handwritten signature in blue ink, appearing to read "N. S. N. R.", written over a horizontal line.

CS. Naramsetti Venkata Siva Naga Raju
Partner
ACS: 37767 C P No.:14940

ANNEXURE

To
M/s COROMANDEL AGRO PRODUCTS AND OILS LIMITED
12-b, Skylark Apartments,
Basheerbagh,
Hyderabad- 500029

The Secretarial Compliance Report of even date is to be read along with this letter.

1. Maintenance of secretarial records under regulations, circulars and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) rules made thereunder and Regulations, circulars and guidelines issued thereunder by SEBI, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed, provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity

4) Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

5) The compliance of the provisions of SEBI ACT and SCRA, and regulations, circulars and guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

6) The Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: 28.05.2019
Date: Vijayawada



For K.Srinivasa Rao & Naga Raju Associates
Company Secretaries

CS. Naramsetti Venkata Siva Naga Raju
Partner
ACS: 37767 C P No.:14940