



Regd. Office :
Bengal Eco Intelligent Park, Tower-1
Block - EM, Plot No. 3, Salt Lake City
Sector - V, 3rd & 15th Floor
Kolkata - 700 091, W.B.
TEL. : 71122334, 71122445
WEBSITE : www.haldiapetrochemicals.com
CIN : U24100WB2015PLC205383
GSTIN : 19AAGCB2001F1Z9

21st May, 2025

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400 001

Scrip Code: 974026 & 974028

Dear Sir / Madam,

Sub: Annual Secretarial Compliance Report

Re: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2025.

Please arrange to bring the same to the Notice of all concerned.

Thanking you,

Yours Sincerely,

For Haldia Petrochemicals Limited

Sarbani Mitra
Company Secretary
A14906



Encl: as above



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

To,
Board of Directors
HALDIA PETROCHEMICALS LIMITED
Bengal Eco Intelligent Park (Techna)
Tower - 1, 3rd Floor, Block-EM, Plot- 3
Sector -V, Bidhan Nagar
Kolkata - 700091

Secretarial Compliance Report in Terms of Regulation 24A (2) Of
SEBI(LODR) Regulations 2015 of HALDIA PETROCHEMICALS Limited
for the year ended 31st March, 2025

We, S.Sarkar & Associates, *Company Secretaries*, have examined:

all the documents and records made available to us and explanation provided by **Haldia Petrochemicals Limited** (CIN:U24100WB2015PLC205383) having its Registered Office at Bengal Eco Intelligent Park (Techna) Tower - 1, 3rd Floor, Block-EM, Plot- 3 Sector -V, Bidhan Nagar Kolkata – 700091 ("the listed entity");

- (a) the filings/submissions made by the listed entity to the stock exchanges;
- (b) website of the listed entity;
- (c) any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2025 ("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, as amended, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015;



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder; and based on above examination, we hereby report that, during the Review Period:

We hereby report that, during the Review Period the compliance status of the listed entity is appended below:

Sr. Number	Particulars	Compliance status (Yes/ No/ NA)	Observations/ Remarks by PCS*
1	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	YES	N.A
2	<u>Adoption and timely up dation of the Policies:</u> 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 has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI	YES	N.A



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

3	<u>Maintenance and disclosures on Website:</u> 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	N.A
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	YES	N.A
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries.	YES	N.A
6.	<u>Preservation of Documents:</u> 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	N.A



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	YES	N.A
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit committee	YES	N.A
9.	<u>Disclosure of events or information:</u> 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.	NA	NA
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	N.A
	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> Yes till 31/03/2025 the stock exchange has imposed a penalty of Rs.200,000(Rupees Two Lac Only) for violation of	YES	The penalty imposed by the Stock exchange and paid by the company for delay submission of



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

11.	Regulation 52 SEBI(LODR)Regulations 2015	NO	financial statement For the quarter ended 31/03/2024. However for non compliance related to quarter ended 30/09/2024 and 31/12/2024 yet to be determined.
12	<u>AdditionalNon-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	NO	As per Regulation 55 of the SEBI (LODR) Regulations, 2015, the Company is required to obtain a credit rating from a recognized credit rating agency. Additionally, as per Regulation 51, in the event of any variation or revision in such credit rating, the Company is obligated to disclose the same to the stock exchange(s) within 24 (twenty-four) hours of receipt of the credit rating report. The Company received a credit rating report on September 17, 2024, which contained a deviation in its credit rating. However, the



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

			<p>disclosure was made to the stock exchange only on October 8, 2024, resulting in a breach of Regulation 51 of the SEBI (LODR) Regulations, 2015.</p> <p>The penalty imposed by the Stock exchange and paid by the company for delay submission of financial statement 31/03/2024. However for non compliance related to quarter ended 30/09/2024 and 31/12/2024 yet to be determined.</p>
--	--	--	---

- (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:-



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	<i>The Company was unable to approve its financial statements for the quarter and year ended March 31, 2024, within 60 (sixty) days from the end of the financial year, as mandated. Furthermore, the Company failed to approve its financial results for the quarters ended September 30, 2024, and December 31, 2024, within the stipulated period of 45</i>	52(2) & 52(2)(d) of SEBI(LODR) Regulations 2015	For the quarter ended 30/09/2024 & 31/12/2024 was not filed till 31/03/2025 and for the quarter ended 31/03/2024 was filed on 09/07/2024	For the quarter ended 30/09/2024 & 31/12/2024 was not filed within 31/03/2024	The stock exchange has imposed a penalty of Rs.200000 for non compliance for the quarter ended 31/03/2024 and the company paid the amount.	Regulation 52(2) and 52(2)(d) of SEBI(LODR) Regulations 2015	Rs.200000	As stated	Due to the ongoing strategic restructuring and refinancing initiatives aimed at fortifying the Company's financial position and ensuring long-term stability, the Company was unable to meet the prescribed deadline. The Company has submitted the financial results for the Financial Year ended 31/03/2024 On 09/07/2024 and for the Quarter & Half Year	N.A



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

	(forty-five) days from the end of each respective quarter. These delays constitute a violation of the first proviso to Regulation 52(1) and Regulation 52(2)(d) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations").								ended 30/09/2024 and Quarter & Nine Months ended 31/12/2024 on 15/05/2025.	
2	Pursuant to Regulation 55 of the SEBI (LODR) Regulations, 2015, the Company is required to obtain a credit rating from a recognized credit rating agency. Additionally, as per Regulation 51, in the event of any variation or revision in such credit	51 of SEBI(LODR) Regulations 2015	Delay submission of Credit rating report with the stock exchange	Delay submission of Credit rating report with the stock exchange	N.A	51 of SEBI(LODR) Regulations 2015	N.A	As stated	The delay in disclosure of the revised credit rating was inadvertent and unintentional. The Company has taken note of the lapse and is implementing stricter internal controls to ensure timely compliance with disclosure requirements under	N.A



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

rating, the Company is obligated to disclose the same to the stock exchange(s) within 24 (twenty-four) hours of receipt of the credit rating report. The Company received a credit rating report on September 17, 2024, which contained a deviation in its credit rating. However, the disclosure was made to the stock exchange only on October 8, 2024,									Regulation 51 and 55 of SEBI (LODR) Regulations, 2015 going forward	
---	--	--	--	--	--	--	--	--	---	--

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



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action (Advisory / Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A
2.	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A
3	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A
4	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A	N.A



S.SARKAR & ASSOCIATES
Company Secretaries

Angana Apartment, 2nd Floor
57/2/1 Sarat Park, Kolkata-700078
Mob: (+ 91) 9231699339, 7278563812
Email: cssandip.sarkar@gmail.com

For S.SARKAR & ASSOCIATES
Company Secretaries

Sandip
Sarkar

Digitally signed
by Sandip Sarkar
Date: 2025.05.21
07:18:13 +05'30'

SANDIP SARKAR
(Proprietor)

Membership No-FCS 7524
CP No-9483

PRC No- 2516/22

UDIN- F007524G000393569

Date : 21/05/2025

Place: Kolkata