



CONTINENTAL PETROLEUMS LIMITED

Regd. Office : A-2, Opp. Udyog Bhawan, Tilak Marg, C-Scheme, JAIPUR - 302 005 Rajasthan (INDIA)
Phone: +91-141-222 2232 Email : conpetco@gmail.com
CIN No. : L23201RJ1986PLC003704 GSTN : 08AAACC7033L1ZM

Contol

Lubricants-Accelerating Performance
www.contol.in
www.conpetco.com

Date: 30/05/2023

To,
The Manager (Department of Corporate Affairs)
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai- 400001

SCRIPT CODE: 523232 SCRIPT ID: CONTPTR

Sub: Submission of Annual Secretarial Compliance Report under regulation 24A of SEBI (Listing obligation and disclosure Requirement) 2015 for the financial year ended on 31st March, 2023.

Dear Sir/Madam,

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, we enclose here with a copy of Annual Secretarial Compliance Report for the year ended on 31st March 2023 issued by CS Trishla Gupta, Practicing Company Secretaries.

Kindly acknowledge the receipt of the same and update your records.

Thanking You

Yours Faithfully,

For CONTINENTAL PETROLEUMS LIMITED
CIN: L23201RJ1986PLC003704

MADAN LAL KHANDELWAL
DIN: 00414717
MANAGING DIRECTOR



Encl: as above



ISO 14001:2015 & 9001:2015 Certified

**Annual Secretarial Compliance Report of
Continental Petroleum Limited for the year ended 31st March, 2023**

I, Mrs. Trishla Gupta, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Continental Petroleum Limited (CIN: L23201RJ1986PLC003704) ("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, 2023 ("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 from time to time), 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 in relevant financial year 2022-23**
- (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 in relevant financial year 2022-23**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable in relevant financial year 2022-23**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable in relevant financial year 2022-23**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable in relevant financial year 2022-23**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants), Regulations, 2015;
- (j) Other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the review period:



- 1 (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)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

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

Sr. No.	Compliance Requirement (Regulations /circulars/guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director for the quarter ended December 2021	Regulation 17(1)	Listed entity failed to appoint Woman director on time	BSE LIMITED	Fine imposed	Fine of Rs. 542800/- was imposed by BSE Limited	Rs. 542800	The Company has failed to appoint Woman director on time although non-compliances have been rectified w. e f 24.02.2022.	Non-compliances have been rectified w. e f 24.02.2022.	--
2.	Non-compliance with the requirements pertaining to appointment or continuation of non-executive director who has attained the age of seventy-five years for the quarter ended December 2021	Regulation 17(1A)	Failed to comply with the provisions of Reg	BSE LIMITED	Fine imposed	Fine of Rs. 2360/- was imposed by BSE Limited	Rs. 2360/-	The Company failed to comply although non-compliances have been rectified w. e f 24.02.2022.	Non-compliances have been rectified w. e f 24.02.2022.	--



 Trishla Gupta
 Company Secretary

(c) Additional affirmations in terms of the BSE circular reference No. 20230316-14 dated 16 March 2023.

Sr. No.	Particulars	Compliance status (Yes/No/N/A)	Observations /Remarks by PCS*
1.	<u>Secretarial Standard</u> The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	
2.	<u>Adoption and timely updation 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 have been reviewed & timely update as per the regulations/circulars/guidelines issued by SEBI	Yes	
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 redirect to the relevant document(s)/section of the website	Yes	
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
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 others subsidiaries	NA	No Subsidiary Company
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 LODRR Regulations, 2015	Yes	
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	
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	





**TRISHLA GUPTA
COMPANY SECRETARY**

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.	Yes	
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	
11.	<u>Action taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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	Yes	
12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation / circular / guidance note etc.	Yes	

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

Date: 30.05.2023

Place: Jaipur



CS Trishla Gupta
FCS 10968
CP 15612

Company Secretary in Practice
UDIN: F010968E000417880