

# Rajkumar R. Tiwari

M.Com. LL.M., DFM. PGDCM&IA., M.Phil., DIPL, DLL, DTL, FCS  
Practising Company Secretary

1413, Navjivan Society-3  
Lamington Road  
Mumbai Central  
Mumbai 400 008  
Tele. 23011981  
(M) 9820353375  
e-mail:raj\_nj13@hotmail.com

To,  
The Board of Directors  
Global Offshore Services Limited  
CIN: L61100MH1976PLC019229  
101, Swapna Bhoomi, "A" Wing,  
S.K. Bole Road, Dadar - (West),  
Mumbai-400028

Sir / Madam,

## Secretarial Compliance Report for the Financial Year 2020-21

I have been engaged by Global Offshore Services Limited (hereinafter referred to as 'the Company') bearing CIN: L61100MH1976PLC019229 whose equity shares are listed on the Bombay Stock Exchange Limited (BSE) and voluntarily delisted from the National Stock Exchange of India Limited (NSE) w.e.f. 22nd March, 2021 to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise, proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars / guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars / guidelines issued there under from time to time and issue a report thereon.

The audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

Place: Mumbai  
Date: 21<sup>st</sup> June, 2021



Rajkumar R. Tiwari  
Company Secretary in whole time practice:  
G.P. No.: 2400 FCS No.: 4227

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## SECRETARIAL COMPLIANCE REPORT OF GLOBAL OFFSHORE SERVICES LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021

(Issued pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019)

I, Rajkumar R. Tiwari, Practising Company Secretary (Membership No. FCS 4227 & CP No. 2400), Mumbai have examined:

- (a) all the documents and records made available to me and explanation provided by **Global Offshore Services 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 **31<sup>st</sup> March, 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 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; (hereinafter referred to as LODR);



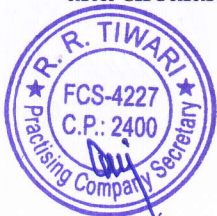
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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not Applicable as there was no reportable event during the financial year under review;**
- (c) Securities and Exchange Board of India (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) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996;
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

and circulars / guidelines issued thereunder;



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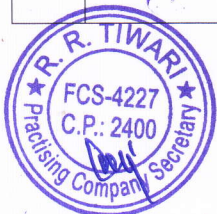
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and based on the above examination, I hereby report that, during the review period;

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (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 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 Practising Company Secretary, if any.
1	National Stock Exchange of India Limited (NSE)	Reg. 19 (1) / (2) – On verification of Corporate Governance Report submitted by the company for the quarter ended March 31, 2020 it was observed that the company had not complied with regulation 19(1)/(2) of Listing Obligations and Disclosure Requirements Regulations, 2015.	Levy of fine via email dated 03 <sup>rd</sup> July, 2020 of Rs. 21,240 /-.	The Company has paid the fine within the prescribed time period and also informed Stock Exchange of the corrective action initiated in this regard.



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

Sr. No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended..... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1	2019-2020	Reg.19(1)/(2) – On verification of Corporate Governance Report submitted by the company for the quarter ended December 31, 2019 it was observed that the company had not complied with regulation 19(1)/(2) of Listing Obligations and Disclosure Requirements Regulations, 2015 which levied fine of Rs. 4,000/- by National Stock Exchange of India Limited (NSE) vide Notice dated 03 <sup>rd</sup> February, 2020.	The Company has paid the fine within the prescribed time period and also informed Stock Exchange of the corrective action initiated in this regard.	The Company has paid the fine within the prescribed time period and also informed Stock Exchange of the corrective action initiated in this regard.

Place: Mumbai  
Date: 21<sup>st</sup> June, 2021



*Rajkumar R. Tiwari*  
21/06/2021  
CS Rajkumar R. Tiwari  
Company Secretary in whole time practice  
C.P. No.: 2400 FCS No.:4227  
UDIN: F004227C000494519