

**Secretarial Compliance Report**  
of  
**M/s. KEERTHI INDUSTRIES LIMITED**  
For the Financial Year ended 31.03.2022

We, M/s. VCSR & Associates, Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by M/s. **KEERTHI INDUSTRIES LIMITED**, having its Registered Office at Plot 40, IDA Balanagar Hyderabad, Telangana-500037, hereinafter referred to as "**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") 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;
- 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; *No such cases*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *No such cases*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *No such cases*
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *No such cases*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations; 2015;



- i) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulations, 2016; **No such cases**
- j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009- **No such cases**
- k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018;

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:

S. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- 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:

S. 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:

S. 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
1.	Regulation 17(1) of SEBI (LODR) Regulations, 2015	Delayed in complying the requirements of the said regulation with respect to the composition of Board of Directors.	Notice of non-compliance, requiring the company to pay a fine of Rs. 5,42,800/- and Rs. 1,82,900/-, aggregating of Rs. 7,25,700/- (including GST), was served to the Company on different dates i.e. 17.11.2020 and 17.05.2021 respectively.	The prescribed fine amount of: 1. Rs. 5,42,800/- (including GST) was paid to BSE on 29.12.2020. 2. Rs. 1,82,900/- (including GST) was paid to BSE on 19.05.2021.

Place: Hyderabad  
Date: 17.05.2022



For VCSR & Associates  
Company Secretaries

*Ch. Vee*

(Ch. Veeranjanyulu)  
Partner

M No. F6121, C P No.: 6392