

VINOD KOTHARI & COMPANY

Practising Company Secretaries
1006-1009, Krishna Building, 224 A.J.C. Bose Road
Kolkata – 700 017, India
Phone: +91 – 33 – 2281 7715 | 1276 | 3742
email: corplaw@vinodkothari.com
Web: www.vinodkothari.com
Unique Code – P1996WB042300
PAN No - AAMFV6726E
Udyog Adhar Number – WB10D0000448

SECRETARIAL COMPLIANCE REPORT OF KIRAN VYAPAR LIMITED FOR THE YEAR ENDED MARCH 31, 2021

To,
The Members,
Kiran Vyapar Limited

We, M/s Vinod Kothari & Company, have examined:

- all the documents and records made available to us and explanation provided by Kiran Vyapar Limited (the “listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2021 (“**Review Period**”) in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 (“Act”) and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956, 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



Mumbai office: 403-406, Shreyas Chambers, Fort, Mumbai – 400001, Ph- 022-22614021
Delhi office: A-467, First Floor, Defence Colony, New Delhi 110016, Ph -011-41315340

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(d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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	Regulation Name/SEBI Circular number	Regulation Number/ circular dated	Compliance Requirement (Regulations/ circulars / guidelines including specific clauses)	Deviations	Observation details
None					

(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 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 Practising Company Secretary, if any.



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None

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

Sr. No.	Regulation Name/SEBI Circular number	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
Not Applicable.					

(e) The listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has accordingly issued engagement letter to the Statutory Auditor on October 19, 2020, for the financial year ending 31st March, 2021.

For M/s Vinod Kothari & Company
Company Secretaries in Practice



Date: 10.06.2021
Place: Kolkata

Barsha Dikshit

Barsha Dikshit
Partner
Membership No: A48152
CP No.: 18060
UDIN: A048152C000440381