

VR DAKSHIN PRIVATE LIMITED

(Formerly Sugam Vanijya Holdings Private Limited)
Corporate Identity Number: U74899KA1987PTC070519

Date: May 30, 2023

To,
General Manager
Department of Corporate Services
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001, Maharashtra.

Scrip Code: 951654, 958505, 958506, 974772, 974773, 974774
ISIN: INE084S08013, INE084S07015, INE084S07023, INE084S08021, INE084S08039,
INE084S08047

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report of VR Dakshin Private Limited (Formerly Sugam Vanijya Holdings Private Limited) for the year ended March 31, 2023, issued by Sourav & Associates, Practicing Company Secretaries (PCS).

This is for your kind information and necessary records.

Thanking you,

Yours faithfully,
For VR Dakshin Private Limited



Rajendra Pai
(Chief Financial Officer)

Encl: As Above



GST: 07DJUPS7070C1ZP

A Peer Reviewed Firm Vide Certificate No. 3143/2023

**Secretarial Compliance Report of VR Dakshin Private Limited for the financial
year ended March 31, 2023**

To

The Members,

VR Dakshin Private Limited

Formerly known as Sugam Vanijya Holdings Private Limited

(CIN: U74899KA1987PTC070519)

V R Bengaluru, No. 11B, SY NO. 40/9,

Devasandra Industrial Area, 2nd Stage,

KR. Puram Hobli Bengaluru -560048

I, **CS Sourav**, Proprietor of M/s Sourav & Associates, Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **VR Dakshin Private Limited** having CIN: U74899KA1987PTC070519 (*hereinafter referred as 'the Company' or 'the listed entity'*), having its Registered Office at V R Bengaluru, No. 11B, SY NO. 40/9, Devasandra Industrial Area, 2nd Stage, KR. Puram Hobli Bengaluru -560048. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on **March 31, 2023** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I **CS Sourav**, Proprietor of M/s Sourav & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by the listed entity;
- (b) the filings/ submissions made by the listed entity to the stock exchange;
- (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 financial year ended March 31, 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, 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 ***[Not Applicable as the Listed Entity has not bought back/ propose to buy-back any of its securities during the review period];***
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 ***[Not Applicable as the Listed Entity has not offered any shares or granted any options pursuant to any employee benefit scheme during the review period];***
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Regulations and Bye-laws framed under the Depositories Act, 1996 to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

- I. 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 N	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.	The statement giving the number of investor complaints	13(3)	Delay of 672 days for uploading investor complaints for the quarter ending December 30, 2020 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 672 days for uploading investor complaints for the quarter ending December 30, 2020 to BSE	Rs. 7,92,960 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	

2.	Prior intimation to the stock exchange of at least two working days in advance,	50(1)	Delay in submitting disclosure for the BM held in the month of Jan, 2021	BSE	Fine was levied by BSE Ltd.	Delay in submitting disclosure for the BM held in the month of Jan, 2021	Rs. 2,360 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.
3.	Prior intimation to the stock exchange of at least two working days in advance,	50(1)	Delay in submitting disclosure for the BM held in the month of Feb, 2021	BSE	Fine was levied by BSE Ltd.	Delay in submitting disclosure for the BM held in the month of Feb, 2021	Rs. 2,360 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely

									compliance with SEBI LODR regulations on the BSE portal.
4.	Prior intimation to the stock exchange of at least two working days in advance,	50(1)	Delay in submitting disclosure for the BM held in the month of Mar, 2021	BSE	Fine was levied by BSE Ltd.	Delay in submitting disclosure for the BM held in the month of Mar, 2021	Rs. 2,360 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.
5.	The listed entity shall disclose the extent and nature of security created and maintained for secured	54	Delay of 512 days for uploading for the quarter ending March 31, 2021 to	BSE	Fine was levied by BSE Ltd.	Delay of 512 days for uploading for the quarter ending March 31, 2021 to	Rs. 6,04,160 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff,

	listed non-convertible debt securities		BSE			BSE			leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
6.	Submission of unaudited Financial Statements for the quarter ending September 30, 2021	52(1)	Delay of 374 days for uploading Financial Statements for the quarter ending September 30, 2021 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 374 days for uploading Financial Statements for the quarter ending September 30, 2021 to BSE	Rs. 22,06,600 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	

7.	The listed entity shall disclose the extent and nature of security created and maintained for secured listed non-convertible debt securities	54(2)	Delay of 374 days for uploading for the quarter ending September 30, 2021 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 374 days for uploading for the quarter ending September 30, 2021 to BSE	Rs. 4,41,320 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.
8.	Disclosure of line items along with the Financial Statements for the quarter ending September 30, 2021	52(4)	Delay of 374 days for uploading Financial Statements for the quarter ending September 30, 2021 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 374 days for uploading Financial Statements for the quarter ending September 30, 2021 to BSE	Rs. 4,41,320 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely

									compliance with SEBI LODR regulations on the BSE portal.	
9.	The statement giving the number of investor complaints	13(3)	Delay of 399 days for uploading investor complaints for the quarter ending September 30, 2021 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 399 days for uploading investor complaints for the quarter ending September 30, 2021 to BSE	Rs. 4,70,820 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
10	Submission of unaudited Financial Statements for the quarter ending December 31,	52(1)	Delay of 283 days for uploading Financial Statements for the quarter	BSE	Fine was levied by BSE Ltd.	Delay of 283 days for uploading Financial Statements for the quarter	Rs. 16,69,700 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and	

	2021		ending December 31, 2021 to BSE			ending December 31, 2021 to BSE			managemen nt staff, leading to their unavailabili ty to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
11	Disclosure of line items along with the Financial Statements for the quarter ending December 31, 2021	52(4)	Delay of 283 days for uploading Financial Statements for the quarter ending December 31, 2021 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 283 days for uploading Financial Statement s for the quarter ending December 31, 2021 to BSE	Rs. 3,33,940 (includi ng GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and managemen nt staff, leading to their unavailabili ty to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
12	The listed entity shall	54(2)	Delay of 283 days	BSE	Fine was	Delay of 283 days	Rs. 3,33,940	The Company has paid the	As a result of the	

	disclose the extent and nature of security created and maintained for secured listed non-convertible debt securities		for uploading for the quarter ending December 31, 2021 to BSE		levied by BSE Ltd.	for uploading for the quarter ending December 31, 2021 to BSE	(including GST)	penalty amount levied by BSE Ltd.	COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
13	Submission of unaudited Financial Statements for the quarter ending March 31, 2022	52(1)	Delay of 178 days for uploading Financial Statements for the quarter ending March 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 178 days for uploading Financial Statements for the quarter ending March 31, 2022 to BSE	Rs. 10,50,200 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI	

									LODR regulations on the BSE portal.	
14	Disclosure of line items along with the Financial Statements for the quarter ending March 31, 2022	52(4)	Delay of 178 days for uploading Financial Statements for the quarter ending March 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 178 days for uploading Financial Statements for the quarter ending March 31, 2022 to BSE	Rs. 2,10,040 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
15	The listed entity shall disclose the extent and nature of security created and maintained for secured listed non-convertible	54(2)	Delay of 178 days for uploading for the quarter ending March 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 178 days for uploading for the quarter ending March 31, 2022 to BSE	Rs. 2,10,040 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their	

	debt securities								unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
16	The details for all the non-convertible securities for which interest/dividend/principal obligations shall be payable during the quarter ending on March 31, 2022	57(4)	Delay in submission	BSE	Fine was levied by BSE Ltd.	Delay in submission	Rs. 3,540 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
17	The statement giving the number of investor complaints	13(3)	Delay of 126 days for uploading investor complaints	BSE	Fine was levied by BSE Ltd.	Delay of 126 days for uploading investor complaint	Rs. 1,48,680 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of	

			for the quarter ending June 30, 2022 to BSE			s for the quarter ending June 30, 2022 to BSE			compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
18	Submission of unaudited Financial Statements for the quarter ending June 30, 2022	52(1)	Delay of 100 days for uploading Financial Statements for the quarter ending June 30, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 100 days for uploading Financial Statements for the quarter ending June 30, 2022 to BSE	Rs. 5,90,000 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	

19	Disclosure of line items along with the Financial Statements for the quarter ending June 30, 2022	52(4)	Delay of 100 days for uploading Financial Statements for the quarter ending June 30, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 100 days for uploading Financial Statements for the quarter ending June 30, 2022 to BSE	Rs. 1,18,000 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.
20	The listed entity shall disclose the extent and nature of security created and maintained for secured listed non-convertible debt securities	54(2)	Delay of 100 days for uploading the quarter ending June 30, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 100 days for uploading for the quarter ending June 30, 2022 to BSE	Rs. 1,18,000 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely

									compliance with SEBI LODR regulations on the BSE portal.
21	The details for all the non-convertible securities for which interest/dividend/principal obligations shall be payable during the quarter ending on June 30, 2022	57(4)	Delay in submission	BSE	Fine was levied by BSE Ltd.	Delay in submission	Rs. 2,360 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.
22	The details for all the non-convertible securities for which interest/dividend/principal obligations	57(5)	Delay in submission	BSE	Fine was levied by BSE Ltd.	Delay in submission	Rs. 3,540 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff,

	shall be payable during the quarter ending on March 31, 2022								leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
23	A listed entity shall appoint a qualified company secretary as the compliance officer	6(1)	Delay of 637 days	BSE	Fine was levied by BSE Ltd.	Delay of 637 days	Rs. 6,37,000 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
24	The listed entity shall appoint a share transfer	7(1)	Delay of 637 days	BSE	Fine was levied by BSE	Delay of 637 days	Rs. 6,37,000 (including GST)	The Company has paid the penalty amount levied	As a result of the COVID-19 outbreak,	

	agent				Ltd.			by BSE Ltd.	there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
25	Submission of unaudited Financial Statements for the quarter ending December 31, 2022	52(1)	Delay of 23 days for uploading Financial Statements for the quarter ending December 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 22 days for uploading Financial Statements for the quarter ending December 31, 2022 to BSE	Rs. 1,35,700 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations	

									on the BSE portal.	
26	Submission of unaudited Financial Statements for the quarter ending June 30, 2022	52(4)	Delay of 23 days for uploading Financial Statements for the quarter ending December 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 23 days for uploading Financial Statements for the quarter ending June 30, 2022 to BSE	Rs. 27,140 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
27	Statement indicating the utilization of issue proceeds/Material deviation in the use of proceeds	52(7)	Delay of 23 days for uploading for the quarter ending December 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 23 days for uploading for the quarter ending December 31, 2022 to BSE	Rs. 27,140 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to	

									ensure timely compliance with SEBI LODR regulations on the BSE portal.	
28	The listed entity shall disclose the extent and nature of security created and maintained for secured listed non-convertible debt securities	54(2)	Delay of 23 days for uploading for the quarter ending December 31, 2022 to BSE	BSE	Fine was levied by BSE Ltd.	Delay of 23 days for uploading for the quarter ending December 31, 2022 to BSE	Rs. 28,320 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and management staff, leading to their unavailability to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
29	Prior intimation to the stock exchange of at least two working days in advance,	50(1)	Delay in submitting disclosure for the BM held in the month of Dec, 2022	BSE	Fine was levied by BSE Ltd.	Delay in submitting disclosure for the BM held in the month of Dec, 2022	Rs. 5,000 (including GST)	The Company has paid the penalty amount levied by BSE Ltd.	As a result of the COVID-19 outbreak, there was a shortage of compliance officers and	

									managem nt staff, leading to their unavailabili ty to ensure timely compliance with SEBI LODR regulations on the BSE portal.	
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b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S N	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	Managem ent Response	Rema rks
NIL										

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the auditreport for such financial year.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	<p>No such event occurred during the review period</p>
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the AuditCommittee:</p>	<p>NA</p>	<p>No such event occurred during the review period</p>

	<p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p>	NA	
	<p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p>	NA	
	<p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p>	NA	

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS*
	ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	No Such event occurred during the review period.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 th October, 2019.	NA	No Such event occurred during the review period.

III. We hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI) as	Yes	-

	notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.		
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity; • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	<p>Yes</p> <p>Yes</p>	<p>-</p> <p>-</p>
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> • 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 	<p>No</p> <p>No</p> <p>NA</p>	<p>The Listed entity failed to maintain a functional website and also failed to upload mandatory documents as required under regulation 62 of the SEBI (LODR) Regulations, 2015.</p> <p>-</p>

	Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website;		
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013as confirmedby the listed entity.	Yes	-
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a) Identification of material subsidiary companies; b) Disclosure requirement of material as well as other subsidiaries	NA NA	The Company does not have any material subsidiary.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documentsand Archival policy prescribed under SEBI (LODR) Regulations, 2015.	Yes	-
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all	NA	-

	<p>related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.</p>	NA	-
9.	<p>Disclosure of events or information:</p> <p>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.</p>	Yes	-
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	-
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been 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.</p>	Yes	-
12.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	Yes	-

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Sourav & Associates
Company Secretaries

SOURAV Digitally signed by
SOURAV
Date: 2023.05.30
23:10:31 +05'30'

CS Sourav

(Proprietor)

Membership No.: A-46883

CP No. 21259

UDIN: A046883E000432499

PR No: 3143/2023

Date: May 30, 2023

Place: New Delhi