



# KILPEST INDIA LIMITED

## REGD. OFFICE & FACTORY :

7-C, INDUSTRIAL AREA, GOVINDPURA, BHOPAL - 462 023 (INDIA)

Tel : (91-755) 2586536, 2586537, 2586439

FAX NO. : (91-755) 2580438

Email : kilpest@bsnl.in

kilpestbpl@yahoo.co.in

visit us at : www.kilpest.com

CIN : L24211MP1972PLC001131

Ref. No.P-66/  
May 26, 2023

The Relationship Manager,  
Department of Corporate Relations  
BSE Limited,  
P.J. Towers, Dalal Street  
Fort, MUMBAI – 400 001

Dear Sir,

**Subject: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2023**

**Ref: Regulation 24A of the Securities and Exchange Board of India ('SEBI') (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations')**

Pursuant to the Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of M/s Kilpest India Limited and its material subsidiary, M/s 3B BlackBio Biotech India Limited dated May 25, 2023 issued by CS Praveen Kumar Rai, Proprietor of P.K. Rai & Associates, Practicing Company Secretary, for the year ended March 31, 2023.

This is for your information and records please.

Thanking you,  
For Kilpest India Limited

**Nikhil Kuber** Digitally signed by  
Nikhil Kuber Dubey  
**Dubey** Date: 2023.05.26  
13:55:19 +05'30'

Nikhil Kuber Dubey  
Whole Time Director  
DIN: 00538049

Encl: As above



P.K. RAI  
M.Com.,L.L.B., FCS

# P.K. RAI & ASSOCIATES

**PRACTICING COMPANY SECRETARIES**

Office : 159, F-5, 1st Floor, Smriti Complex, Zone-II, M.P. Nagar, Bhopal-11  
Phone : 0755-2761172, Mob.: 9303124872, E-mail: cspkrai@gmail.com

Ref.: .....

Date : .....

## Secretarial Compliance Report of Kilpest India Limited for the year ended March 31, 2023

To,  
KILPEST INDIA LIMITED  
7-C, Industrial Area,  
Govindpura,  
Bhopal- 462023

I, CS Praveen Kumar Rai, Proprietor of P.K. Rai & Associates, Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanations and representations provided by **Kilpest India 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 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 (including amendments, modifications from time to time), whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the company during the review period);
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the company during the review period);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not applicable to the company during the review period)

(f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable to the company during the review period);

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic,

I hereby report that, during the Review Period:

a) The listed entity has generally 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 (Advisory / Clarification/ Fine /Show Cause Notice / Warning, etc.)	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:

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Sr. No	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory / Clarification/ Fine /Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
<b>NOT APPLICABLE</b>										

Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

Sr. No	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standard</u> 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)	YES	NONE
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 has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI	YES	NONE
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	YES	NONE

	<ul style="list-style-type: none"> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>		
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	YES	NONE
5.	<u>To examine details related to .</u> <u>Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies; (b) Requirements with respect to disclosure of material as well as other subsidiaries	YES	The Company has a Material subsidiary, namely, 3B BlackBio Biotech India Limited.
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 LODR Regulations, 2015	YES	NONE
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/ during the financial year as prescribed in SEBI Regulations	YES	NONE
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	NONE
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	YES	NONE



# P.K. RAI & ASSOCIATES

Practicing Company Secretaries

	within the time limits prescribed thereunder.		
10.	<b>Prohibition of Insider Trading:</b> The Listed Entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	NONE
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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	NONE
12.	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc	YES	NONE

For P.K.Rai & Associates  
Practicing Company Secretary

CS PRAVEEN KUMAR RAI

Proprietor

M.No:6313

C.P.No:3779

UDIN: L24211MP1972PLC001131

Date: 25/05/2023

Place:Bhopal

PR No.:3474/2023



P.K. RAI  
M.Com.,L.L.B., FCS

# P.K. RAI & ASSOCIATES

**PRACTICING COMPANY SECRETARIES**

Office : 159, F-5, 1st Floor, Smriti Complex, Zone-II, M.P. Nagar, Bhopal-11  
Phone : 0755-2761172, Mob.: 9303124872, E-mail: cspkrai@gmail.com

Ref.: .....

Date : .....

## Secretarial Compliance Report of 3B BlackBio Biotech India Limited for the year ended March 31, 2023

To,  
3B BLACKBIO BIOTECH INDIA LIMITED  
7-C, Industrial Area,  
Govindpura,  
Bhopal- 462023

I, CS Praveen Kumar Rai, Proprietor of P.K. Rai & Associates, Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanations and representations provided by **3B BlackBio Biotech India Limited**, ("material subsidiary"),
- (b) the filings/ submissions made by the material subsidiary,
- (c) Website of the material subsidiary,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31 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 (including amendments, modifications from time to time), whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; (Not applicable to the company during the review period)
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not applicable to the company during the review period);
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (Not applicable to the company during the review period)
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the company during the review period);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not applicable to the company during the review period)

(f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable to the company during the review period);

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (Not applicable to the company during the review period)

h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; (Not applicable to the company during the review period)

and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic,

I hereby report that, during the Review Period:

a) The material subsidiary has not complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder as they are not applicable to the company during the review period, 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 (Advisory / Clarification/ Fine /Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
NIL										

b) The material subsidiary has taken the following actions to comply with the observations made in previous reports: (Not applicable to the company during the review period)

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Sr. No	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory / Clarification/ Fine /Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
<b>NOT APPLICABLE</b>										

Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

Sr. No	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standard</u> The compliances of the material subsidiary are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	YES	NONE
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 material subsidiary. • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI	YES	NONE
3.	<u>Maintenance and disclosures on Website:</u> • The material subsidiary is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website	YES	NONE

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	<ul style="list-style-type: none"> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>		
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	YES	NONE
5.	<u>To examine details related to .</u> <u>Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies; (b) Requirements with respect to disclosure of material as well as other subsidiaries	YES	NONE
6.	<u>Preservation of Documents:</u> The material subsidiary 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 LODR Regulations, 2015	YES	NONE
7.	<u>Performance Evaluation:</u> The material subsidiary 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	NONE
8.	<u>Related Party Transactions:</u> (a) The material subsidiary has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the material subsidiary shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee	YES	NONE
9.	<u>Disclosure of events or information:</u> The material subsidiary has provided all the required	YES	NONE

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