

P.K. RAI & ASSOCIATES

PRACTICING COMPANY SECRETARIES

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| Ref.: | Date : |
|-------|--------|
| | Dato |

SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2022

To,
The Members,
M/s Kilpest India Ltd,
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 us and explanation provided by **Kilpest India Ltd**, ("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 $31^{\rm st}$ March, 2022 ("Review Period") in respect of compliance with 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 there under 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; (Not applicable to the listed entity during the Review Period)
- (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 to the listed entity 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 listed entity during the Review Period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the listed entity during the Review Period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018;
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (Not applicable to the listed entity during the Review Period)

and circulars/ guidelines issued thereunder; 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, except in respect of matters specified below:

| Sr. 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 there under in so far 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 there under:

| Sr. No. | Action Taken* | Details Of | Details Of Action | Observations/ | |
|---------|---------------|------------|-------------------|----------------|--|
| | Ву | Violation | Taken | Remarks Of | |
| | | | eg.Fines,warning | The Practicing | |
| | | | letters, | Company | |
| | | | debarment, etc. | Secretary ,If | |
| | | | | Any. | |
| | | • | | | |
| NIL | | | | | |
| | | | | | |



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

| Sr. No. | Observations of the Practicing 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 Practicing Company Secretary on the actions taken by the listed entity | |
|---------|--|---|--|--|--|
| NIL | | | | | |

For P.K. Rai & Associates Practicing Company Secretary

CS PRAVEEN KUMAR RAI

Proprietor M.No: 6313

C.P.No. 3779

UDIN: F006313D000376861

Date: - 24th May, 2022

Place: Bhopal