

KBC Global Limited

(Previously known as Karda Constructions Limited)

Registered Office : 2nd Floor, Gulmohar Status, Above Business Bank, Samarth Nagar, Nashik, MH - 422005.
Corporate Office : Saikrupa Commercial Complex, Tilak Road, Muktidham, Nashik Road, Nashik - 422 101.
Phone : 0253 - 2465436 / 2351090, Fax : 0253 - 2465436, Mail : admin@kardaconstruction.com,
Visit us : www.kardaconstruction.com, CIN No. : L45400MH2007PLC174194



Date: 30.05.2024

To,

The Listing Compliance National Stock Exchange India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai-400 051.	Department of Corporate Services, BSE LIMITED P.J. Towers, Dalal Street, Mumbai-400 001.
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NSE SYMBOL: KBCGLOBAL

BSE Script Code: 541161

Sub: COMPLIANCE UNDER REGULATION 24(A) OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

Dear Sir/ Madam,

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report duly issued by the Practicing Company Secretary for the financial year ended March 31, 2024.

This is for your information and records.

For KBC Global Limited

NARESH Digitally signed
by NARESH
JAGUMA JAGUMAL KARDA
Date: 2024.05.30
L KARDA 16:16:29 +05'30

Naresh Jagumal Karda
Managing Director
DIN: 01741279

Encl: As above.

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Secretarial compliance report of KBC GLOBAL LIMITED

for the year ended 31st March, 2024

We, Krushang Shah & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by KBC GLOBAL LIMITED (Formerly known as Karda Constructions 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 31st March, 2024 (“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 (SEBI LODR Regulations);
- (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 during the period under review)*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021; *(Not applicable during the period under review)*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during the period under review)*
- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities) Regulations, 2021; *(Not applicable during the period under review)*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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(I) SEBI (Depositories and Participants) Regulations, 2018;

We have examined the compliance of above regulations, circulars, guidelines issued thereunder as applicable during the review period and based on confirmation received from management of the Company as and when required affirm that:

Sr. No	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable</p>	Yes	
2	<p>Adoption and timely updation of the Policies:</p> <p>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</p> <p>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	
3	<p>Maintenance and disclosures on Website:</p> <p>The Listed entity is maintaining a functional website</p> <p>Timely dissemination of the documents/ information under a separate section on the website</p> <p>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</p>	Yes	
4	<p>Disqualification of Director:</p>	Yes	

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	None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.		
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	Yes	
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 Documents and 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 related party transactions; or (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	Yes	
9	Disclosure of events or information: 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 except as provided under separate paragraph herein (a)(i).	Yes	
10	Prohibition of Insider Trading:	Yes	

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	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
11	Actions taken by SEBI or Stock Exchange(s), if any: 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 except as provided under separate paragraph herein (a)(i).	Yes	The Stock Exchange has freeze the holdings of the promoters and promoter group for none payment of fine levied as per the provisions of SOP Circular.
12	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

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		
	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 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 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 audit report for such financial year.	NA	No Such Event During Review Period
2	Other conditions relating to resignation of statutory auditor		
	i. Reporting of concerns by Auditor with	NA	No Such Event During

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	<p>respect to the listed entity/its material subsidiary to the Audit Committee:</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> <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> <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> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>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</p>		Review Period
3	The listed entity / its material subsidiary has obtained information from the Auditor upon	NA	No Such Event During Review Period

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	resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.		
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- (a) (i) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

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Sr. No.	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 listed entity shall submit annual audited financial results for the financial year, within sixty days from the end of the financial year	Reg. 33 (3) of SEBI LODR Regulations	The Company has not approved the Financials for quarter and year ended March 2023 with in stipulated time.	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	Delayed Compliance with Regulation 33 of SEBI LODR Regulations	BSE: Rs. 2,24,200/- NSE: 1,90,000/-	The Company has paid the requisite fine to stock Exchanges.	Due to non-availability of financials of wholly owned subsidiary the delay happened.	-
2	The Listed entity require to submit to stock exchanges Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or	Regulation 30 read with Schedule III of SEBI LODR Regulation	The Company has not submitted newspaper advertisement relating to General Meeting held on October 21, 2023 to Stock Exchange	-	-	The Company has not submitted newspaper advertisement relating to General Meeting held on October 21, 2023 to Stock Exchange	-	The Company has not submitted newspaper advertisement relating to General Meeting held on October 21, 2023 to Stock Exchange	The Management will ensure that there are no such instance going forward.	-

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	advertised in the media by the listed entity									
3	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the end of the Quarter	Reg. 33 (3) of SEBI LODR Regulations	The Company has not approved the Financials for quarter ended June 2023 with in stipulated time.	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	Delayed Compliance with Regulation 33 of SEBI LODR Regulations	BSE: Rs. 3,54,000/- NSE: 3,65,000/-	The Company has paid the requisite fines to stock Exchanges.	Due to non-availability of financials of wholly owned subsidiary and non-availability of some board Members the delay happened.	-
4	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the end of the Quarter	Reg. 33 (3) of SEBI LODR Regulations	The Company has not approved the Financials for quarter and half year ended September 2023 with in stipulated time.	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	Delayed Compliance with Regulation 33 of SEBI LODR Regulations	BSE: Rs. 3,77,600/- NSE: Rs. 9,70,000/-	The Company has paid the requisite fines to stock Exchanges.	Due to non-availability of financials of wholly owned subsidiary the delay happened.	-
5	Pursuant to Regulation 29 (2) of SEBI LODR Regulation, Mandates that the Company shall give prior intimation to stock exchange regarding	Regulation 29 (2) SEBI LODR Regulations	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for	BSE: Rs. 10,000/- NSE: Rs. 10,000/-	The Company has not given prior intimation for Board meeting held on January 18, 2024 for approval of financial results for quarter and	The Management will ensure that there are no such instance going forward.	-

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	meeting of Board of Directors in which proposal for financial results is due to be considered.		quarter and half year ended on September, 2023			quarter and half year ended on September, 2023		half year end September, 2023. The Company has paid the requisite fines to stock Exchanges		
6	Pursuant to Regulation 29 (2) of SEBI LODR Regulation, Mandates that the Company shall give prior intimation to stock exchange regarding meeting of Board of Directors in which proposal for financial results is due to be considered.	Regulation 29 (2) SEBI LODR Regulations	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter and nine month ended on December, 2023	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter and nine month ended on December, 2023	BSE: Rs. 10,000/- NSE: Rs. 10,000/-	The Company has not given prior intimation for Board meeting held on March 29, 2024 for approval of financial results for quarter and nine month end December, 2023. The Company has paid the requisite fines to stock Exchanges	The Management will ensure that there are no such instance going forward.	-
7	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the end of the Quarter	Reg. 33 (3) of SEBI LODR Regulations	The Company has not approved the Financials for quarter and nine month ended December 2023 with in stipulated time.	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine	Delayed Compliance with Regulation 33 of SEBI LODR Regulations	BSE: Rs. 3,36,300/- NSE: Rs. 2,20,000/-	The Company has paid the requisite fines to stock Exchanges.	Due to non-availability of some board members the delay happened.	-

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8	The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to on the date of publication of its standalone and consolidated financial results	Reg. 23(9) of SEBI LODR Regulations read with stock exchanges circular on Filing of Related Party Transactions in XBRL mode	The Company has delay in filling the disclosure of Related party transactions for March, 2023.	-	-	Delayed Compliance with Regulation 23 (9) of SEBI LODR Regulations	-	The Company has delay in filling disclosure on related party transactions.	The Management will ensure that there are no such instance going forward.	-
9	The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to on the date of publication of its standalone and consolidated financial results	Reg. 23(9) of SEBI LODR Regulations read with stock exchanges circular on Filing of Related Party Transactions in XBRL mode	The Company has delay in filling the disclosure of Related party transactions for September, 2023.	-	-	Delayed Compliance with Regulation 23 (9) of SEBI LODR Regulations	-	The Company has delay in filling disclosure on related party transactions.	The Management will ensure that there are no such instance going forward.	-
10	The listed entity shall undertake Directors and Officers	Reg. 25 (10) of SEBI LODR Regulations	The Company has not taken Directors and Officers	-	-	The Company has not taken Directors and Officers	-	The Company has not taken Directors and Officers	The Company is in process of renewal/ obtain fresh policy.	-

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	insurance ('D and O insurance') for all their independent directors of such quantum and for such risks as may be determined by its board of directors		insurance.			insurance.		insurance.		
11	Where the listed entity does not have a regular non-executive chairperson, at least half of the board of directors shall comprise of independent directors	Regulation 17 (1) (b) of SEBI LODR Regulations	The Half of the Board has not been Independent Director	-	-	The Company does not have the Board composition as per SEBI LODR Regulations	-	The Company has yet to appoint such number of directors to make its self complied with SEBI LODR Regulations	The Company is in process of identifying suitable person to appoint as Independent Directors	-
12	The Board of Directors of top 2000 listed entities shall comprise of not less than six Directors	Regulation 17 (1) (c) of SEBI LODR Regulations	The Company does not have six Directors	-	-	The Company does not have six Directors	-	The Company does not have six Directors	The Company is in process of identifying suitable persons to appoint as Directors to meet the regulatory requirements	-
13	The listed entity shall ensure that approval of shareholders for	Regulation 17 (1C) of SEBI LODR Regulations	The Company has not taken Members approval for	-	-	The Company has not taken Members approval for	-	The Company has not taken Members approval for	The Management takes not the provisions and	-

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	appointment or re-appointment of a person on the Board of Directors or as a manager is taken at the next general meeting or within a time period of three months from the date of appointment, whichever is earlier		appointment of Mr. Sri Ram Pavan Kumar Vemuri.			appointment of Mr. Sri Ram Pavan Kumar Vemuri with in stipulated time period.		appointment of Mr. Sri Ram Pavan Kumar Vemuri within stipulated time period.	ensure that no such incident happens in future.	
14	Any vacancy in the office of a director shall be filled by the listed entity at the earliest and in any case not later than three months from the date such vacancy	Regulation 17 (1E) of SEBI LODR Regulations	The Company has failed to fill casual vacancy cause due to demise of Mr. Manohar Karda.	-	-	The Company has failed to fill casual vacancy cause due to demise of Mr. Manohar Karda.	-	The Company has failed to fill casual vacancy cause due to demise of Mr. Manohar Karda.	The Company is in process of identifying suitable persons to appoint as Directors to met the regulatory requirements	-

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the Previous reports (PCS)	Observations made in the secretarial compliance report for the year ended March, 2023 (the Years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines Including specific clause)	Details of violation / deviations and Actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The Company has not approved the Financials for quarter and year ended March 2022 with in stipulated time.	The listed entity shall submit annual audited financial results for the financial year, within sixty days from the end of the financial year	The listed entity shall submit annual audited financial results for the financial year, within sixty days from the end of the financial year	The Company has not approved the Financials for quarter and year ended March 2022 with in stipulated time.	The Company has paid the requisite fine to stock Exchanges.	The Company has paid the fine.
2	The Company has not filed statement of investor complaint in XBRL mode, which was mandatory based on stock Exchanges circulars for March, 2022 quarter. However, the Company has submitted the said disclosure in pdf mode.	The listed entity shall file with the recognised stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end	The listed entity shall file with the recognised stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end	The Company has not filed statement of investor complaint in XBRL mode, which was mandatory based on stock Exchanges circulars for March, 2022 quarter. However, the Company has submitted the said disclosure in pdf mode.	The Company has delay in filling statement of investor complaints in XBRL mode. However, the Company has filed the said in pdf mode within prescribed time.	No further comments required.

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		of the quarter			
3	The Company has delay in filling the disclosure of Related party transactions for March, 2022 in XBRL mode. However, the Company has filed the same in pdf.	The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time with in 15 days from the publication of its financial results	The Company has delay in filling the disclosure of Related party transactions for March, 2022 in XBRL mode. However, the Company has filed the same in pdf.	The Management will ensure that there are no such instance going forward.	No further comments required.
4	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter and year ended on March, 2022	Pursuant to Regulation 29 (2) of SEBI LODR Regulation, Mandates that the Company shall give prior intimation to stock exchange regarding meeting of Board of Directors in which proposal for financial results is due to be considered.	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter and year ended on March, 2022	The Management will ensure that there are no such instance going forward.	No further comments required.
5	The Company has filed outcome of Board Meeting dated June 07, 2022 after the stipulated time i.e. with in 30 minutes from closure of Board Meeting.	Pursuant to Regulation 30 read with Schedule III of SEBI LODR Regulation, the Company has to submit outcome of Board Meeting in which financial results was declared with in 30 minutes of closure of Board Meeting.	The Company has filed outcome of Board Meeting dated June 07, 2022 after the stipulated time i.e. with in 30 minutes from closure of Board Meeting.	The Company has filed outcome of Board Meeting dated June 07, 2022 after the stipulated time i.e. with in 30 minutes from closure of Board Meeting.	No further comments required.

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6	The Company has not approved the Financials for quarter ended June 2022 with in stipulated time.	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the end of the Quarter	The Company has not approved the Financials for quarter ended June 2022 with in stipulated time.	The Company has paid the requisite fines to stock Exchanges.	No further comments required.
7	The Company has filed shareholding pattern for the quarter ended June 2022 with the stock exchanges after the 21 days from end of quarter.	The listed entity shall require to submit quarterly shareholding pattern with the stock exchanges within 21 days from the end of each quarter	The Company has filed shareholding pattern for the quarter ended June 2022 with the stock exchanges after the 21 days from end of quarter.	The Company has made delay in filling shareholding pattern for June, 2022 quarter and paid the requisite fines to stock exchanges. The Company has paid the Fine Amount.	No further comments required.
8	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter ended June, 2022	Pursuant to Regulation 29 (2) of SEBI LODR Regulation, Mandates that the Company shall give prior intimation to stock exchange regarding meeting of Board of Directors in which proposal for financial results is due to be considered.	The Company has not given the prior intimation of 5 days for the proposal of consideration of approval of financial results for quarter ended June, 2022	The Management will ensure that there are no such instance going forward. The Company has paid the Fine Amount.	No further comments required.
9	The Company has not filed statement of investor complaint in XBRL mode, which was mandatory based on stock Exchanges circulars for June, 2022 quarter. However, the Company has submitted the said disclosure in pdf mode.	The listed entity shall file with the recognised stock exchange(s) on a quarterly basis, within twenty one days	The Company has not filed statement of investor complaint in XBRL mode, which was mandatory	The Company has delay in filling statement of investor complaints in XBRL mode.	No further comments required.

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		from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter	based on stock Exchanges circulars for June, 2022 quarter. However, the Company has submitted the said disclosure in pdf mode.	However, the Company has filed the said in pdf mode within prescribed time.	
10	The promoter Mr. Naresh Karda has not intimated to Company and the stock exchanges about his invocation of pledge with in time.	The promoter of every target company shall disclose details of any invocation of such encumbrance or release of such encumbrance of shares within seven working days from the creation or invocation or release of encumbrance, as the case may be.	The promoter Mr. Naresh Karda has not intimated to Company and the stock exchanges about his invocation of pledge with in time.	The Management will ensure that there are no such instance going forward.	No further comments required.
11	The Company has taken Directors and Officers insurance which was expired during the year and the renewal not done during the Review Period.	The listed entity shall undertake Directors and Officers insurance ('D and O insurance') for all their independent directors of such quantum and for such risks as may	The Company has taken Directors and Officers insurance which was expired during the year and the renewal not done during the Review Period.	The Company is in process of renewal/ obtain fresh policy.	Yet to Comply

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		be determined by its board of directors			
12	The Company has not used digital signature certificates while filling to announcement in September, 2022 month	Circular on use of digital signature certificate for announcement submitted by listed company	The Company has not used digital signature certificates while filling to announcement in September, 2022 month	The Management will ensure that there are no such instance going forward.	No further comments required.
13	The Company has not submitted newspaper advertisement relating to Annual General Meeting to Stock Exchange	The Listed entity require to submit to stock exchanges Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity	The Company has not submitted newspaper advertisement relating to Annual General Meeting to Stock Exchange	The Management will ensure that there are no such instance going forward.	No further comments required.
14	The Company has not approved the Financials for quarter and half year ended September 2022 with in stipulated time.	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the end of the Quarter	The Company has not approved the Financials for quarter and half year ended September 2022 with in stipulated time.	The Company has approved the Financial Results for September, 2022 on 25 th November, 2022.	No further comments required.
15	The Company has not approved the Financials for quarter and Nine Month ended December 2022 with in stipulated time.	The listed entity shall require to submit quarterly unaudited financial results for the quarter ended within forty five days from the	The Company has not approved the Financials for quarter and Nine Month ended December 2022 with in	The Company has approved the Financial Results for December, 2022 on 8 th May, 2023.	No further comments required.

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		end of the Quarter	stipulated time.		
16	The Company has filed shareholding pattern for the quarter ended December 2022 with the stock exchanges after the 21 days from end of quarter.	The listed entity shall require to submit quarterly shareholding pattern with the stock exchanges within 21 days from the end of each quarter	The Company has filed shareholding pattern for the quarter ended December 2022 with the stock exchanges after the 21 days from end of quarter.	The Company has filed shareholding pattern for December, 2022 quarter on 1 st April, 2023.	No further comments required.
17	The Company has delay in filling annual report in XBRL mode as directed in Stock Exchanges circulars.	A copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders and pursuant to Clarification issued by Exchanges on filling of Annual Report in XBRL mode	The Company has delay in filling annual report in XBRL mode as directed in Stock Exchanges circulars.	The Company has filled the same. The Management will ensure that there are no such instance going forward.	No further comments required.

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.

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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A 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.

Krushang Shah & Associates

Krushang Shah
Company Secretary in practice
ACS No.: 42187
C P No.: 26085
PRC : 3653/2023
UDIN: A042187F000494342

Date: 30.05.2024
Place: Ahmedabad

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