



# KEY CORP LIMITED

16/16-A, Civil Lines, Kanpur - 208 001  
CIN-L65921 UP1985 PLC007547  
e-mail : keycorpltd@gmail.com

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Ref: KCL/2021-22/VKP1/05/152

Dated: 15.06.2021

Bombay Stock Exchange Ltd.  
Phiroz Jeejeebhoy Towers,  
Dalal Street  
**MUMBAI-400 051**

SCRIPT CODE: 507948

**Sub: Submission of Annual Secretarial Compliance Report for the Financial year 2020-21**

Dear Sir,

We are filing herewith Annual Secretarial Compliance Report, issued by Vibha Mehrotra, Practicing Company Secretaries as per Regulation 24(A) of SEBI (LODR) Regulation 2015 for the financial year 2020-21,

Please take the same on records and oblige.

Yours faithfully,  
For KEY CORP LIMITED,

  
(V.K. PANDEY)  
JOINT SECRETARY



Encl: As above.



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**Secretarial Compliance Report**  
**KEY CORP LIMITED**  
**For the year ended 31<sup>st</sup> March, 2021**

*(Pursuant to Reg 2hA of SEBI (LODR) Regulations 2015*

To,  
The Members,  
Key Corp Limited,  
16/16A, Civil Lines,  
**KANPUR-208001**

I Vibha Mehrotra have examined:

- (a) all the documents and records made available to us and explanation provided by the management of Key Corp Ltd.
- (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<sup>st</sup> March, 2021 ("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 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; N.A.
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; N.A.
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; N.A.

For Vibha Mehrotra & Co

*Vibha Mehrotra*

Proprietor

Contd....2/-



(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; N.A.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; N.A.

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; N.A.

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

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

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   | NIL        | NIL   |

(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 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 Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Accts/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 Practicing Company Secretary, if any.               |
|---------|-----------------|---|---|---|
| 1.      | Fine            | Regulation 27(2)<br>Regulation 34<br>Regulation 23<br>Regulation 6(1) | Fine<br>Rs.2,78,480.00  | Fine paid<br>Rs.2,78,480.00   |
| 2.      | Fine            | Regulation 23(9)  | Fine<br>Rs.3,42,200.00  | Petition filed on 21.05.2021 for waiver of fine. Promoter Demant Account ceased |

For Vibha Mehrotra & Co

Vibha Mehrotra

Proprietor

Contd....3/-



( 3 )

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

| Sr. No.        | Observations of the Practicing Company Secretary in the Previous reports | Observation 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 |
|----------------|--|--|--|--|
| Not Applicable |  |  |  |  |

Place: Kanpur  
Date: 15-06.2021

for VIBHA MEHROTRA & COMPANY  
COMPANY SECRETARIES

  
(VIBHA MEHROTRA)  
Proprietor  
FCS 3103, CP-1832

VDIN - F003103C00462760