

Date: 30.06.2021

To, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400 001 Scrip Code: 590041	To, The Manager, Department of Corporate Services, The National Stock Exchange of India Limited BKC Complex, Bandra (East), Mumbai NSE Symbol: KAVVERITEL
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Subject : Secretarial Compliance Report under Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Ref : Disclosure under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sirs,

With reference to the caption subject, In terms of Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclosed herewith Secretarial Compliance Report for the financial year ended 31st March, 2021.

Kindly take the same on record.

Thanking You,

Yours faithfully,

For Kavveri Telecom Products Limited



CHENNAREDDY SHIVAKUMARREDDY

Managing Director

DIN: 01189348



G BHAT & ASSOCIATES

Company Secretaries

1748 | 18th Main | 8th Cross | Marenahalli

J P Nagar 2nd Phase | Bangalore - 560078

TELEPHONE: +91-9611 589 769

E-MAIL: guruprasadbhatcs@gmail.com

SECRETARIAL COMPLIANCE REPORT OF KAVVERI TELECOM PRODUCTS LIMITED FOR THE YEAR ENDED 31st MARCH, 2021

I, Guruprasada Bhat, Practising Company Secretary have examined all the documents and records made available to us and explanation provided by KAVVERI TELECOM PRODUCTS LIMITED, having registered office at Plot No.31-36, 1st Floor, 1st Main 2nd Stage Arakere Mico Layout Bannerghatta Road, Bangalore 560076 and bearing CIN L85110KA1996PLC019627 ('the listed entity'), and the filings/submissions made by the listed entity to the stock exchanges, website of the listed entity and other document/filing and as may be relevant, which has been relied upon to make this certification for the Financial Year ended 31st March, 2021 ("1st April, 2020 to 31st March, 2021") 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;



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

(i) Circulars/Guidelines issued thereunder;

Based on the above examination, | hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued except in respect of matters specified below:

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
01.	Appointment of Company Secretary Regulation 6(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Not appointed Company Secretary for the quarter ender 30 th June 2020	The company appointed the company secretary to the company in the Board Meeting held on 14th September 2020.
02.	Appointment of Company Secretary Regulation 6(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Not appointed Company Secretary for the quarter ender 30 th September 2020	The company appointed the company secretary to the company in the Board Meeting held on 14th September 2020
03.	Reporting of Related Party Transactions. Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in reporting the related party discloser.	The company is no entered any related party transaction for the half ended 30 th September 2020. Hence the reporting relating to this was not made to the stock exchange. However company have submitted the NIL return to the respective stock exchange on 01 st February 2021.



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Composition of nomination and remuneration committee. Regulation 19(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015	Only two directors in the committee are the non-executive director.	Listed entity may ensure to comply with the provisions by appointing the non-executive director to the committee.
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(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 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 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.
01.	National Stock Exchange	Not appointed Company Secretary for the quarter ender 30 th June 2020	Levied penalty of Rs. 91,000/-	Company paid the penalty.
02.	National Stock Exchange	Not appointed Company Secretary for the quarter ender 30 th September 2020	Levied penalty of Rs. 92,000/-	Company paid the penalty.
03.	National Stock Exchange	Delay in reporting the related party discloser.	Levied penalty of Rs. 2,60,000/-	The penalty is waived off.



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04.	Security and Exchange Board of India	Annexed SEBI Order	Annexed SEBI Order	Listed entity may ensure to comply with all the applicable provisions of the regulations.
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(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	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 G Bhat & Associates
Company Secretaries

CS Guruprasada Bhat
Company Secretary in Practice
M. No.: A48176
CP. No.: 18963
UDIN: A048176C000557949

Place: Bangalore
Date: 30/06/2021

CS GURUPRASADA BHAT
Company Secretary In Practice
M. No. A48176
C.P. No. 18963