

June 11, 2021

The Secretary
BSE Limited
Pheeroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai - 400 001
Scrip Code: 531595

The Secretary
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor
Plot No- 'C' Block, G Block
Bandra-Kurla Complex, Bandra (East)
Mumbai – 400 051
Scrip Code: CGCL

Sub: Secretarial Compliance Report for the Financial Year ended March 31, 2021

Dear Sir and Madam,

In terms of Circular issued by the Securities and Exchange Board of India vide Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 please find enclosed herewith Secretarial Compliance Report for the Financial Year ended March 31, 2021 issued by the Secretarial Auditor of the Company Mr. Haresh Sanghvi, Practicing Company Secretary.

You are requested to kindly take the above information on record.

Thanking you,

Yours faithfully,
for Capri Global Capital Limited

(Harish Agrawal)
Senior Vice President and Company Secretary

Encl.: As above

Capri Global Capital Limited

Registered Office:

CIN: L65921MH1994PLC173469 Regd. Off: 502, Tower A, Peninsula Business Park, Lower Parel, Mumbai – 400013.

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Haresh Sanghvi
Practicing Company Secretary

Secretarial Compliance Report
of
CAPRI GLOBAL CAPITAL LIMITED
(CIN: L65921MH1994PLC173469)
for the year ended 31st March, 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, **Haresh Sanghvi** have examined:

- (a) the documents and records made available to me and explanation provided by **Capri Global Capital Limited** (“the listed entity”),
- (b) the filings/submissions made by the listed entity to BSE Ltd. and National Stock Exchange of India Ltd.,
- (c) website of the listed entity, and
- (d) other books, papers, minute books and other records maintained by the Company and produced before me for verification which has been relied upon to make this certification,

The following Regulations prescribed under the SEBI Act, whose provisions and the circulars/ guidelines issued thereunder, have been examined:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations, 2015”);
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations, 2015”);
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; and
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008.

There were no actions/ events in pursuance of following Regulations prescribed under SEBI Act, requiring compliance thereof by the Company during the year ended 31st March, 2021 (“Period”) under review:

- (a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (c) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- (d) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

and based on the above examination and verification of the documents and records produced before me and according to the information and explanations given to me by the Company, I hereby report that, during the Period under review:



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M : 9920124310 email: hpsanghvi@gmail.com

Haresh Sanghvi
Practicing Company Secretary


- (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
1	Regulation 30 read with Clause 2 of Part A of Schedule III of LODR Regulations, 2015	The Outcome of the Board Meeting dated 9 th May, 2020, at which the audited financial results for the year ended 31 st March, 2020 were approved, was submitted to the stock exchanges with delay.	As per the explanation given by the Company, the delay of about fourteen minutes in submitting the outcome of the Board Meeting to BSE Limited was caused due to technical glitch in internet connection at the Company's office, delaying receipt of the OTP for log-in on the Stock Exchange's portal and prolonging the upload processing time. No explanation was called for by the Stock Exchanges in this regard.

- (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) No actions were 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.
- (d) The observations made in previous report was with regard to the delayed disclosure made by the Company and since it does not require any further clarification, the reporting of actions by the listed entity to comply with the same, does not arise during the Period under review.

Place: Mumbai
Date: 27th May, 2021




Haresh Sanghvi
Practicing Company Secretary
FCS No.: 2259/CoP No.: 3675
UDIN: F002259C000381770

Note: Due to ongoing COVID19 pandemic and consequent lock-down imposed, I could not verify the compliance documents physically for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode.