



KRISHNA
V E N T U R E S
CREATING FOUNDATIONS

Date: May 28, 2022

The Manager
The Corporate Relationship Department
Bombay Stock Exchange Limited
P.J. Towers, Dalal Street,
Mumbai – 400001

Name of Scrip: Krishna Ventures Limited
Scrip Code: 504392

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2022

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find attached Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, given by M/s G Aakash & Associates, Practicing Company Secretaries.

Kindly acknowledge the receipt.

Thanking you.
Yours faithfully,

For **Krishna Ventures Limited**

**Neeraj
Gupta**

(NEERAJ GUPTA)
Managing Director
DIN: 07176093

Digitally signed by Neeraj Gupta
DN: cn=N. Gupta, postalCode=201 005, st=Uttar
Pradesh,
c=IN, serial=5047512267649995849746245649484647e
2b463072c1e4326494e0d777e,
email=neeraj@krishnaventures.com, o=Krishna Ventures
Private Limited,
serialNumber=310112612115442003, cn=744050816.01
CD496C02EE5D7D66A07E1F61513F3F97, ou=Neeraj
Gupta
Date: 2022.05.28 16:10:14 +05'30'



G AAKASH & ASSOCIATES

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF KRISHNA VENTURES LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A (1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors
Krishna Ventures Limited
Corporate Centre, 7th Floor, Andheri Kurla Road,
Andheri (East), Mumbai- 400 059

Dear Sir,

We have examined:

(a) all the documents and records made available to us and explanation provided by your company i.e. KRISHNA VENTURES 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/ filings, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

(i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

(ii) 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");

(e) The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

(i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable for the F.Y 2021-22)**

(iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



1878, H.B.C., Sector-13, 17, Panipat-132103, Haryana, Phone: +91-9991264017, 8377974087
Email: cs.goelaakash@gmail.com

(iv) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **(Not applicable for the F.Y 2021-22)**

(v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014/ SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable for the F.Y 2021-22)**

(vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable for the F.Y 2021-22)**

(vii) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable for the F.Y 2021-22)**

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

(ix) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/guidelines issued thereunder; and based on the above examination,

We hereby report that, during the Review Period:

(1) 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.	Reg-24A of the SEBI (LODR), 2015	Non Submission of Secretarial Compliance Report	Secretarial Compliance Report was to be submitted on or before June 30, 2021 which has not been submitted till date. As of March 08, 2022, the basic fine levied by BSE was Rs. 5,02,000/- (Rupees Five Lakhs Two Thousand Only) Plus GST which wasnot paid by the Company till March 31, 2022.
2.	Reg-17(1) of the SEBI (LODR), 2015	Non-compliance with respect to the composition of the Board of Directors	As of March 08, 2022, the basic fine levied by BSE was Rs. 25,000/- (Rupees Twenty Five Thousand Only) Plus GST. The Company filedan application for waiver of the fine which was subsequently approved by BSE.Hence, as of March 31, 2022, there is no non-compliance ofReg-17(1) of the SEBI (LODR), 2015.
3.	Reg-18(1) of the SEBI (LODR), 2015	Non-compliance with respect to the composition	As of March 08, 2022, the basic fine levied by BSE was Rs. 1,82,000/- (Rupees One Lakh Eighty Two Thousand Only) Plus



		of the Audit Committee	GST. The Company filed an application for waiver of the fine which was subsequently approved by BSE. Hence, as of March 31, 2022, there is no non-compliance of Reg-17(1) of the SEBI (LODR), 2015.
4.	Reg-19(1)/19(2) of the SEBI (LODR), 2015	Non-compliance with respect to the composition of Nomination and remuneration Committee	As of March 08, 2022, the basic fine levied by BSE was Rs. 1,82,000/- (Rupees One Lakh Eighty Two Thousand Only) Plus GST. The Company filed an application for waiver of the fine which was subsequently approved by BSE. Hence, as of March 31, 2022 there is no non-compliance of Reg-17(1) of the SEBI (LODR), 2015.
5.	Reg-23(9) of the SEBI (LODR), 2015	Late Submission of Disclosure of Related Party Transactions	Disclosure of Related Party Transactions on a consolidated basis was to be submitted on or before December 14, 2021 for the half year ended September 30, 2021. The same was submitted on February 26, 2022. As of March 08, 2022, the basic fine levied by BSE was Rs. 3,70,000/- (Rupees Three Lakhs Seventy Thousand Only) Plus GST which was not paid by the Company till March 31, 2022.
6.	Reg 6(1) of the SEBI (LODR), 2015	Non-compliance with respect to the appointment of Compliance Officer	There was a purported contravention with regards to the appointment of a Compliance Officer in the Company for the quarter ended September 2021. As of March 08, 2022, the basic fine levied by BSE was Rs. 92,000/- (Rupees Ninety Two Thousand Only) Plus GST which has been withdrawn by BSE after the close of the financial year 2021-2022. Hence, as of March 31, 2022 there is non-compliance of Reg-17(1) of the SEBI (LODR), 2015.
7.	Reg 7(1) of the SEBI (LODR), 2015	Non-compliance with respect to the appointment of Share Transfer Agent	There was a purported contravention with regards to the appointment of Share Transfer Agent in the company for the quarter ended September 2021. As of March 08, 2022, basic fine levied by BSE was Rs. 92,000/- (Rupees Ninety Two Thousand Only) Plus GST which has been withdrawn by BSE after the close of the financial year 2021-2022. Hence, as of March 31, 2022 there is non-compliance of Reg-7(1) of the SEBI (LODR), 2015.



8.	Reg 6(1) of the SEBI (LODR), 2015	Non-compliance with respect to the appointment of Compliance Officer	There was a purported contravention with regards to the appointment of a Compliance Officer in the company for the quarter ended December 2021. As of March 08, 2022, the basic fine levied by BSE was Rs. 68,000/- (Rupees Sixty Eight Thousand Only) Plus GST which has been withdrawn by BSE after the close of the financial year 2021-2022. Hence, as of March 31, 2022 there is non-compliance of Reg-6(1) of the SEBI (LODR), 2015.
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(2) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.

(3) As per the information provided by the management of the Company that, following are the 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:

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3.	Reg-18(1) of the SEBI (LODR), 2015	Non-compliance with respect to the composition of the Audit Committee	As of March 08, 2022, the basic fine levied by BSE was Rs. 1,82,000/- (Rupees One Lakh Eighty Two Thousand Only) Plus GST. The Company filed an application for waiver of the fine which was




			subsequently approved by BSE. Hence, as of March 31, 2022, there is no non-compliance of Reg-17(1) of the SEBI (LODR), 2015.
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8.	Reg 6(1) of the SEBI (LODR), 2015	Non-compliance with respect to	There was a purported contravention with regards to the appointment of a




		the appointment of Compliance Officer	Compliance Officer in the company for the quarter ended December 2021. As of March 08, 2022, the basic fine levied by BSE was Rs. 68,000/- (Rupees Sixty Eight Thousand Only) Plus GST which has been withdrawn by BSE after the close of the financial year 2021-2022. Hence, as of March 31, 2022 there is non-compliance of Reg-6(1) of the SEBI (LODR), 2015.
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(4) Secretarial Compliance Report for the previous year (2020-2021) has not been filed by the Company till date. Hence we cannot comment on any qualification/observation that was made in the Secretarial Compliance Report of the previous year. Hence, the reporting on action taken by the listed entity and our comments thereon is not feasible.

**For G Aakash & Associates
Company Secretaries**


Aakash Goel
(Prop.)
M.No.: A57213
CP No.: 21629
Peer Review No.: 1685/2022
UDIN: A057213D000418024



Date: 28.05.2022
Place: Haryana