

Date: 31-07-2020

To, The Secretary, BSE Limited Phizore Jeejeebhoy Towers, Dalal Street, Mumbai-400001 Scrip Code: 590041	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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Sub: Annual Secretarial Compliance Report for the Year ended 31st March, 2020 pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we have here with attached Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2020 issued by Practicing Company Secretary.

This is for you are your information and necessary Records.

Thanking you,

For **KAVVERI TELECOM PRODUCTS LIMITED**

C Shivakumar Reddy
Managing Director



Passion to Innovate...



**NAVEEN SEKHAR ILLA & ASSOCIATES
COMPANY SECRETARIES**

**SECRETARIAL COMPLIANCE REPORT
OF
KAVVERI TELECOM PRODUCTS LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020**

I, Naveen Sekhar Illa, Company Secretary in Practice, Hyderabad has examined:

All the documents and records made available to me and explanation provided by **M/s. KAVVERI TELECOM PRODUCTS LIMITED (CIN:L85110KA1996PLC019627)** listed entity.

- (a) the filings/submissions made by the listed entity to the stock exchanges,
- (b) website of the listed entity;
- (c) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March 2020 (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;
- (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;

6-3-582/1, 2nd Floor, Gandhi Tata Nagar , Near Zilla Parishad Office, Anand Nagar Colony,
Khairtabad, Hyderabad - 04.

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- (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;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015);
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and 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 there under except the following:

Sr. No	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 46 of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements), 2015	The website of the company as mentioned on BSE site www.kaveritelecoms.com is not functional and gets rerouted to some other website.	The actual (recent) website of the company upon search found to be www.kavveritelecoms.com which is not updated on regular basis.
2.	Regulation 46(2)(q) of Securities and Exchange Board of India (Listing	The listed entity has published the items set out under sub-regulation (1) of regulation 47 of the Securities and Exchange	Although the items set out under sub-regulation (1) of regulation 47 have been published in the newspaper, the newspaper publications

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	Obligation and Disclosure Requirements), 2015	Board of India (Listing Obligation and Disclosure Requirements), 2015 in the newspapers. However, the newspaper publications have not been hosted on the website of listed entity	are also to be disseminated on the website of the listed entity, in terms of Regulation 46(2)(q) of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements), 2015
3.	Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	There is no Company Secretary appointed by the Company.	The Previous Company Secretary has resigned on 01/10/2019, Since then there is no company secretary of the Company.
4.	Regulation 19 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Nomination and Remuneration Committee is constituted of Two Independent Directors along with Promoter Executive Director.	The Committee shall be constituted independent directors along only with Non Executive Directors.
5.	Code of Conduct- Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015	The Closure of Trading window for the Quarter ended 31/12/2019 was reported on 14/01/2020.	The delay in reporting was 14 days.

(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.



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- (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 Eg. Fines, warning letter, debarment, etc;	Observations/ remarks of the Practicing Company Secretary, if any
NIL	NIL	NIL	NIL	NIL

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

**Date: 31-07-2020
Place: Hyderabad**

Signature: 
Naveen Sekhar Illa
Company Secretary in Practice
UDIN: A047896B000541972
ACS No: 47896
C. P. No.: 22863

NAVEEN SEKHAR ILLA
Practicing Company Secretary
M.No. A47896 C.P. No. 22863