

Ref: KCP / SHARE / RB/ 21-22/ 310521

May 31, 2021

National Stock Exchange of India Limited (NSE)  
**Scrip : KCP**  
Bandra Kurla Complex,  
Bandra (E)  
Mumbai-400 051

Bombay Stock Exchange Ltd (BSE)  
**Scrip - 590066**  
Floor No.25, P J Towers  
Dalal Street,  
Mumbai 400 001

Dear Sir /Madam,

**Sub:** Secretarial compliance report for the year ended 31<sup>st</sup> March, 2021

**Ref:** SEBI circular No. CIR/CFD/CMD1/27/2019 dated 08/02/2019

Please find attached the Secretarial compliance report of the company for the year ended 31<sup>st</sup> March, 2021 of Smt. Sobana Pranesh, Practicing Company Secretary, FCS NO. 9825, Chennai.

This is for your information and records.

Thanking you,

**Yours faithfully,**  
**For THE KCP LIMITED,**

Sd/-

**Y. VIJAYAKUMAR**  
**COMPANY SECRETARY AND**  
**COMPLIANCE OFFICER.**

*Sobana Pranesh*  
*Practising Company Secretary*

*Flat 3A, Lilypond*  
*155, Baracca Road*  
*Kilpauk, Chennai - 600010*  
*(M): 91 98409 91159*  
*Email: sobanapranesh@yahoo.co.in*

**Secretarial compliance report of THE KCP LTD. for the year ended 31/03/21**

I, Sobana Pranesh, Practising Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by THE KCP LTD.
- (b) the filings/ submissions made by THE KCP LTD. to the stock exchanges,
- (c) website of THE KCP LTD.,

for the year ended 31/3/2021 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; (The company has not issued any capital during the year)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (No acquisitions & takeovers during the year)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (No buy-back of securities during the year)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (not applicable)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (not applicable)

*Sobana Pranesh*  
*Practising Company Secretary*

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(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (not applicable)

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

and based on the above examination, I/We hereby report that, during the Review Period:

(a) The KCP LTD. has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

<i>Sr.No</i>	<i>Compliance Requirement (Regulations/ circulars /guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/Remarks of the Practising Company Secretary</i>
	nil	nil	nil

(b) The KCP LTD. 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 Company 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:

<i>Sr.No</i>	<i>Action taken by</i>	<i>Details of violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment, etc.</i>	<i>Observations/remarks of the Practising Company Secretary, if any.</i>
	nil	nil	Nil	nil

*Sobana Pranesh*  
Practising Company Secretary

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Email: sobanapranesh@yahoo.co.in

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

Sr.No	Observations of the Practising 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 Practising Company Secretary on the actions taken by the listed entity
	N.A	N.A	N.A	N.A

Place: Chennai

Date: 10/05/2021

*Sobana Pranesh*  
SOBANA PRANESH

Practicing Company Secretary

FCS No:9825

C P No.: 2403

UDIN: F009825C000396453