

CIN : L20200TG1988PLC009157



SRI KPR INDUSTRIES LIMITED



Manufacturers of : "SVP" brand A.C. Pr. Pipes under MAZZA Process
(Formerly Known as Sri Venkateswara Pipes Limited)

5th Floor, V.K. Towers, S.P. Road, Secunderabad - 500 003 (T.S.)

Phone : +91-40-27847121, e-mail : svpl9@yahoo.com & skil9@yahoo.com *bsvpl9@yahoo.com*

Date: 30.05.2023

To
The General Manager
BSE Limited
PhirozeJeejabhoy Towers
Dalal Street, Fort
Mumbai - 400 001

Scrip Code : 514442

Dear Sir/Madam,

Sub: Filing of Annual Secretarial Compliance Report (ASCR) for the FY-2022-23 ended 31-03-2023

With reference to the captioned subject and in compliance with Regn.24A and other/ applicable Regulations of SEBI, please find enclosed herewith the Annual Secretarial Compliance Report of our Company for the Financial Year ended 31-03-2023 as issued by M/s BS & Company Company Secretaries LLP, Practicing Company Secretaries, Hyderabad

Kindly note the above and take the same on your records.

Yours Faithfully

For Sri KPR Industries Limited

KISHAN
REDDY NALLA

Digitally signed by
KISHAN REDDY NALLA
Date: 2023.05.30
15:55:12 +05'30'

N. KISHAN REDDY
MANAGING DIRECTOR
DIN: 00038966

To,
The Board of Directors
Sri KPR Industries Limited
5th Floor, V K Towers
Sardar Patel Road,
Secunderabad 500003

Sub: Annual Secretarial Compliance Report for the Financial Year 2022-23

Dear Sir,

We have been engaged by Sri KPR Industries Limited (hereinafter referred to as the "Company") bearing CIN: L20200TG1988PLC009157 whose equity shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulation and Circulars/Guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the company with provisions of all applicable SEBI Regulations and Circulars / Guidelines issued from time to time and issue a report thereon.

Audit was conducted in accordance with Guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For BS & Company Company Secretaries LLP



Dafthardar Soumya

Designated Partner

C P No.: 13199

FCS No: 11754

UDIN: F011754E000424232

Peer Review No.: P2008AP016900

Date: 30/05/2023

Place: Hyderabad

Registered Office :

5-9-22-71A, Ground Floor, MCH No. 250, Near Birla Temple, Adarsh Nagar Colony, Hyderabad - 500 063.

Ph : 040 - 2323 2327, Email : bs.companysecretaries@yahoo.com

LLP Identification Number : AAE-0638

Secretarial compliance report of Sri KPR Industries Limited
for the year ended 31st March 2023

We, BS & Company Company Secretaries LLP, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to me, and explanations provided by Sri KPR Industries 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/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2023 ("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; - (Not applicable to the company during the audit period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the company during the audit period)
- (f) Securities and Exchange Board of India (Issue and Listing of Non – Convertible Securities) Regulations, 2021; (Not applicable to the company during the audit period)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Issue and Listing of Non – Convertible Securities) Regulations, 2021; (Not applicable to the company during the audit period)
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder;



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and based on the above examination, we hereby report that, during the Review Period:

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

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including Specific Clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	SEBI (LODR) Regulations 2015	23(9)	The company is required to file disclosures of related party transactions with the Stock Exchange within 15 days from the date of publication of its standalone and consolidated financial results. However, there was a delay in submitting the aforesaid report for the year ended 31.03.2022.	BSE	Fine	There was a delay in submitting the aforesaid report for the year ended 31.03.2022	Rs. 23,600/-	The Company delayed filing the report under 23(9) of SEBI (LODR) Regulations 2015. However the Company has filed the same and also ended 31st March 2022, paid the penalty levied by the Stock Exchange.	The Company has been regular in filing the returns on time. However, for the half year ended 31st March 2022, there was a delay because of the amendment in the regulation changing the timeline from 30 days to 15 Days.	The Company has filed the report with a delay and has also paid the penalty imposed by BSE.
2	SEBI (Depositories and Participant) Regulations, 2018	76	The Company has submitted the Reconciliation of Share Capital Audit (RSCA) Report for the Quarter ended June' 2022 on 22.07.2022, BSE upon verification of the report for June'22 quarter has sent a mail regarding Non-compliance with requirement to appoint a qualified company secretary as the compliance officer for the quarter ended June' 2022.	BSE	Advisory cum Waiver Request	The Company was advised to mention the details of Company Secretary instead of Compliance officer in the tab of change of compliance officer in the previous two quarters. Further the company was advised to apply for waiver request.	Waiver Application Fee of Rs. 11,800	The Company has not made violation in the RSCA report, However in the details of the previous compliance officer field, Mr. Nandhu Siddha Reddy who has been appointed as Compliance Officer for the time being with effect from 17.03.2022 in place of the resigned Company Secretary and Compliance Officer Ms. Pratyaksha Shukla was submitted	The Company has contacted BSE through email and the suggestion was recommended through submission of RSCA report: "Whether the previous Compliance Officer was Qualified Company Secretary"	The Company has resubmitted the report and submitted waiver application along with fee of Rs. 11,800/- to BSE.



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

S. No	Compliance Requirement (Regulations/circulars/guidelines including specific Clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

We also report that in terms of the circulars issued by BSE Limited and National Stock Exchange of India Limited on March 16, 2023 respectively, we also affirm the following(s):

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standard</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	None None
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/information under a separate section on the website Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website 	Yes Yes Yes	None None None
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None



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5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes Yes	None None
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015	Yes	None
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee	Yes Yes	None None
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI (LODR) Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	No	1. The Company delayed in filing the report under 23(9) of SEBI (LODR) Regulations 2015. However the Company has filed the same and also paid the penalty levied by the Stock Exchange. 2. The Company has resubmitted the RSCA report and submitted waiver application along with fee of Rs. 11,800/- to BSE.


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12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	Yes	None
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For **BS & Company Company Secretaries LLP**



Dafthardar Soumya

Designated Partner

C P No.: 13199

FCS No: 11754

UDIN: F011754E000424232

Peer Review No.: P2008AP016900

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