

To,

Date: 29.05.2022

BSE Limited
P. J. Towers, Dalal Street,
Mumbai-400001

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015

Ref: Scrip Code: 540570

Unit: Variman Global Enterprises Limited

With reference to the subject cited, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.

This is for the information and records of the Exchange, please.

Thanking you.

Yours sincerely,

For Variman Global Enterprises Limited



D. Sirish
Managing Director
(DIN: 01999844)



Variman Global Enterprises Limited

Corp. Office : #1-2-217/10, Street No. 10, Gagan Mahal, Hyderabad, TS - 500029.
Branch Office: Plot no 47, # 56-10-14/A, Sree Lakshmi Nilayam, P&T Colony-3, Patamata, Vijayawada, AP-520010
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Vivek Surana & Associates

Practicing Company Secretaries

Secretarial Compliance Report of Variman Global Enterprises Limited for the year ended 31.03.2022

We, Vivek Surana & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by Variman Global Enterprises Limited ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchange (BSE Limited),
- (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, 2022 ("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**

Plot No. 8-2-603/23/3, 2nd Floor, Banjara Hills, Road No. 10, Hyderabad-500034, Telangana
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- (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**
- (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 circulars/ guidelines issued thereunder;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not Applicable**
- (j) CIR/CFD/CMD1/114/2019 dated October 18, 2019 (Resignation of statutory auditors from listed entities and their material subsidiaries); **Not Applicable**
- (k) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (l) SEBI circular HO/DDHS/CIR/P/2018/144 dated November 26, 2018 disclosure of large Corporate; **Not Applicable**

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 there under wherever applicable, except in respect of matters specified below:

S. No	Compliance requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company secretary
1.	Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	Non-compliance with disclosure of related party transactions for the quarter and half year ended 30.09.2021	The Company has submitted the required disclosures on 15.01.2022 against the due date of 11.12.2021 and also paid the fine on 18.01.2022

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			for the delay in submitting the same.
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued wherever applicable there under insofar as it appears from our examination of those records.
- (c) The 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 there under:

S. No	Action taken by	Details of Violation	Details of action taken E.g., fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company secretary, if any.
1.	BSE Limited	Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	Fine imposed	The Company has submitted the required disclosures on 15.01.2022 against the due date of 11.12.2021 and also paid the fine on 18.01.2022 for the delay in submitting the same.

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





Vivek Surana & Associates
Practicing Company Secretaries

S. No	Observations of the Practicing Company Secretary in previous reports	Observations made in the Secretarial compliance report for the year ended 31 st March 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Hyderabad
Date: 29.05.2022
M. No.: A24531, CP No: 12901
UDIN: A024531D000421378

For Vivek Surana & Associates

Vivek Surana
Proprietor

