

118-119, Vijay Nagar, Chetakpuri, Gwalior -474007(M.P.)

Tel.: (0751) 4002202 Mobile: 98272-24778 / 7000020543.

E-mail: dudeaassociates@yahoo.com / bdudea@gmail.com

Secretarial Compliance Report of Reliable Ventures India Limited

For The Financial Year Ended 31st March, 2024

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

To,
The Members,
Reliable Ventures India Limited

CIN of the Company: L22354MP1992PLC007295

Authorised Capital: Rs.250000000/-

We, B Dudea & Associates, Practicing Company Secretaries have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Reliable Ventures India Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at having registered office at Reliable House, A - 6, Koh-E-Fiza, BHOPAL, M P- 462001 INDIA. Secretarial Review was conducted in a manner that provided ma a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter

We have examined:

- a) all the documents and records made available to us and explanation provided by Reliable Ventures India 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 report, for the year ended 2024("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");



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) The 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) The 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 (Depositories & Participants) Regulations, 2018;
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009; **(Data for the same is not available for Audit as the Company was under IBC)**
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client-**(Not Applicable to the Company during the Audit Period);**
- (k) Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992 -**(Not Applicable to the Company during the Audit Period);**
&
- (l) Securities and Exchange Board of India (Stock Brokers) Regulations, 1992 and circulars/ guidelines issued thereunder-**(Not Applicable to the Company during the Audit Period).**

(m) Other Regulations as applicable and circulars / guidelines issued there under:

- (a) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Company) Regulations, 1993
- (b) Applicable Rules and Regulations of Companies Act 2013
- (c) The Securities and Exchange Board of India (delisting of Equity Shares) Regulations 2021



We hereby report that during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/ No/ NA)	Observations / Remarks by PCS*
1	<p>Secretarial Standards</p> <p>The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI) as notified by the Central Government under section 11B(10) of the Companies Act 2013 and mandatorily applicable.</p>	Yes	
2	<p>Adoption and timely updation of the Policies</p> <ul style="list-style-type: none"> - All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity - All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars / guidelines issued by SEBI 	Yes	
3	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> -The Listed entity is maintaining a functional website -timely dissemination of 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 documents section of the website. 	Yes	
4	<p>Disqualification of Director:</p> <p>None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes.	
5	<p>Details related to Subsidiaries of listed entity have been examined w.e.f.:</p> <ul style="list-style-type: none"> - Identification of material subsidiary companies 	NA	Company does not have any subsidiaries.



	- Disclosure requirement of material as well as other subsidiaries		
6	Preservation of Documents: 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.	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed by SEBI Regulations.	Yes.	
8	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit Committee in case no prior approval has been obtained.	NA	No material transaction was there
9	Disclosure of events or information: The listed entity has provided all the required disclosures under Regulation 30 along with Schedule III of SEBI LODR Regulations 2015 within the limits prescribed there under.	Yes	
10	Prohibition of Insider Trading; The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI Prohibition of Insider Trading Regulations 2015	Yes.	
11	Action taken by SEBI or Stock Exchange , if any: No action has been taken against the listed entity/ its promoters/ directors/either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars under SEBI Regulations and circulars/ guidelines issued there under.	Yes.	
12	Additional non-compliance, if any: No additional non-compliances observed for any SEBI regulations/ circular/ guidance note etc.	Yes.	



Compliances related to resignation of statutory auditors from listed entity and their material subsidiaries as per SEGI circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr No.	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS
1	<p>Compliances with the following conditions while appointing –re-appointing an auditor</p> <p>i) If the auditor has resigned within 45 days from the end of a quarter of a financial year , the auditor before such resignation has issued the limited review/ audit report for such quarter, or</p> <p>ii) If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii) If the auditor has signed the limited review/ audit report for the first three quarters of a financial year , the auditor before such resignation has issued the limited review / audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA	There is no appointment/ or resignation of auditors during the period under review.
2	<p>Other conditions relating to resignation of statutory auditors.</p> <p>i. Reporting of concerns by Auditors with respect to the listed entity / its material subsidiaries to the Audit Committee:</p> <p>(a) In case of any concern with the management of the listed entity / material subsidiary such as non availability of information/ non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit committee of ;the listed entity and the Audit Committee shall received such concerns directly and immediately without specifically waiting for the quarterly Audit Committee Meeting</p> <p>(b) In case the auditor proposes to resign all concerns with respect to the proposed</p>	NA	There is no Appointment or Re-appointment or Resignation of Auditors during the period under review.



	<p>resignation, along with relevant documents has been brought to the notice of the audit committee. In case where the proposed resignation is due to non-receipt of information/ explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>(c) The Audit Committee/ Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report which is in accordance with the Standard of Auditing as specified by ICAI/ NFRA, in case where the listed entity / its material subsidiary has not provided information as required by the Auditor.</p>		
3.	The listed entity/ its material subsidiary has obtained information from the Auditor upon resignation in the format as specified in Annexure –A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 19 th October, 2019	NA	

We hereby report that during the period under review:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under except in respect of matters specified below:

Sr No.	Compliance requirements (Regulations /circ	Regulation Cir-cular-Nos.	Deviations	Action Taken by	Type Of action	Details Of violation	Fin e Am t	Observations / Remarks/ Of the Practi-Cing Col. Secy.	Manage - ment Res-ponse	Re-Mark s



s inclu ding spec ific clau ses)										
NA		NA								

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

Sr No.	Compliance requirements (Regulations/circulars/guidelines including specific clauses)	Regulation Circular- Nos.	Deviations	Action Taken by	Type Of action	Details Of violation	Fine Amt	Observations/Remarks/Of the Practising Col. Secy.	Mgt Response	Re-Marks
NA		NA								

For **B.Dudea & Associates**
Company Secretaries

Date: 11.04.2024

Place: Gwalior



B. Dudea
Baldev Dudea
(Proprietor)
M No. FCS 6329
C.P. No. 4428
F006329F000094384
Peer Review No. 4791

PS: - This Report is to be read with our Letter of even date which is annexed as Annexure A and Forms an integral part of This Report.

**SECRETARIAL COMPLIANCE REPORT
RELIABLE VENTURES INDIA LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2024**

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

Our Report of even date is to be read along with this letter.


1. Maintenance of Secretarial Record is the responsibility of the management of the company. Our responsibility is to express an opinion on this secretarial record based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, We followed provide a reasonable basis for our opinion.
3. Where ever required, We have obtained the Management representation about the compliance of laws, rules and regulations and happening of event etc.
4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
5. The Compliance report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the company.

Place:- Gwalior

Date:- 11th April, 2024

**For B. Dudea & Associates
Company Secretaries**




(BALDEV DUDEA)
Proprietor
FCS- 6329
CP NO. 4428
DIN F006329F000094384
Peer Review No. 4791