



KELTECH ENERGIES LIMITED AN ISO 9001 & 14001, OHSAS 18001 CERTIFIED COMPANY CIN: L30007KA1977PLC031660

The Secretary, M/s.BSE Ltd., P.J.Towers, Dalal Street, MUMBAI-400001.

Ref: KEL/SEC/43AGM/2020-21. Dated::17" July, 2020.

Dear Sir,

Sub: Submission of Secretarial Compliance Report for the year ended 31st March, 2020 under Regulation 24A of SEBI (LODR) (Amendment) Regulations, 2018.

Please find enclosed herewith the soft copy of Secretarial Compliance Report dated 26th June, 2020 for the year ended 31th March, 2020 under Regulation 24A of SEBI (LODR) (Amendment) Regulations, 2018 issued by Shri Swaroop S., Practising Company Secretary, M/s.Swaroop Suri and Associates, Bengaluru for your reference and records.

Please take the same on record and oblige.

Thanking you,

Yours faithfully, For KELTECH ENERGIES LTD.

SHALU TIBRA COMPANY SECRETARY

Encl: A/A.

SWAROOP SURI AND ASSOCIATES

PRACTISING COMPANY SECRETARIES

SECRETARIAL COMPLIANCE REPORT for the year ended March 31st, 2019

(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018)

- I, Swaroop Suryanarayana, Prop: Swaroop Suri and Associates, Practising Company Secretaries, having office at: 841, First Floor, 12th Main, Vinayaka Layout, Nagarbhavi 2nd Stage, Bengaluru 560072, Karnataka, India have examined:
- (a) all the documents and records made available to us and explanation provided by the Company;
- (b) the filings/ submissions made by the listed entity to the stock exchange;
- (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 March 31, 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 applicable to the Company, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-

- 1. SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993
- 2. SEBI (Procedure for Board Meetings) Regulations, 2001
- 3. SEBI (Central Database of Market Participants) Regulations, 2003
- 4. SEBI (Ombudsman) Regulations, 2003
- 5. SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003
- 6. SEBI (Regulatory Fee on Stock Exchanges) Regulations, 2006
- 7. SEBI (Investor Protection and Education Fund) Regulations, 2009
- 8. SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- 9. SEBI {KYC (Know Your Client) Registration Agency} Regulations, 2011
- 10. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- 11. SEBI (Prohibition of Insider Trading) Regulations, 2015
- 12. SEBI (Settlement Proceedings) Regulations, 2018
- 13. SEBI (Appointment of Administrator and Procedure for Refunding to the Investors) Regulations, 2018
- 14. SEBI (Depositories and Participants) Regulations, 2018 and circulars/guidelines issued thereunder;

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

URIAND

Bengaluru

Address: No. 841, 1st Floor, 12th Main, Vinayaka bayout, Nagarbhavi 2nd Stage, Bengaluru – 560056 **Mob**: +91 91485 43636 **e-mail**: info@swaroopsan.com **Website**: www.swaroopsuri.com



SWAROOP SURI AND ASSOCIATES

PRACTISING COMPANY SECRETARIES

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

Sr. No	Compliance Requirement	Deviations	Observations/	
	(Regulations/ circulars /	1 .	Remarks of the	
	guidelines including		Practicing Company	
	specific clause)		Secretary	
01	Regulation 29(2) & 29(3) of	Delay in intimation	Penalty of Rs.10000/- +	
	SEBI (LODR) Regulations,	to the Stock	GST Rs.1800/- has been	
	2015.	Exchange	paid by the Company.	

- (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.
- (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 default	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary, if any.
1.	M/s.BSE Ltd., Mumbai.	Delay in compliance under Regulations 29(2) and 29(3) of SEBI (LODR) Regulations, 2015.	Penalty of Rs.10000/- + GST Rs.1800/- has been paid by the Company.	Noted by the Secretarial Auditor.

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

Place: Bengaluru Date: 26-06-2020

UDIN: F008977B000385826

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For Swaroop Suri and Associates Company Secretaries

Swaroop S. Proprietor

FCS No. 8977 CP No. 9997