

SECRETARIAL COMPLIANCE REPORT

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

Annual Secretarial Compliance Report of "Kanani Industries Limited" for the year ended March 31, 2022

We, Deep Shukla & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Kanani Industries Limited [CIN: L51900MH1983PLC029598]** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other relevant document(s)/ filing, which has been relied upon to make this certification,

for the year ended March 31, 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, are:-

- (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 ; *[Not applicable during the review period]*



- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 *(to the extent applicable)*;
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; ***[Not applicable during the review period]***
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ***[Not applicable during the review period]***
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***[Not applicable during the review period]***
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; ***[Not applicable during the review period]***
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 *(to the extent applicable)*;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, as amended;
- (k) The Securities and Exchange Board of India (Intermediaries) Regulations, 2008; ***[Not applicable during the review period]***
- (l) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/guidelines issued thereunder;.

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 some of the regulation(s) of SEBI (LODR), 2015;*

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 17(1)	Non-compliance with respect to Board composition	Non-appointment of required Non-Executive Directors on the Board.



			However, the same is complied with as on the date of issue of the report
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our 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 violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	BSE	The Company has received e-mail from BSE on 17th May, 2021 for non-compliance of Reg. 17(1) of SEBI (LODR), 2015 for quarter ended March 31, 2021	Fines was imposed of Rs. 3,18,600/-	As informed by the management that they have submitted appropriate reply along with waiver of fine on 19th May, 2021
2.	BSE	The Company has received e-mail from BSE on 6 th August, 2021 for non-compliance of Reg. 17(1) of SEBI (LODR), 2015 for quarter ended December 31, 2020	Fines was imposed of Rs. 5,42,800/-	As informed by the management that they have made the payment on August 13, 2021



3	NSE	The Company has received e-mail from NSE on January 10, 2022 for violation of Reg. 17(1) of SEBI (LODR), 2015 for quarter ended December 30, 2020 and March 31, 2021	Fines was imposed of Rs. 8,61,400/-	As informed by the management that they have made the payment on January 17, 2022
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company has not complied Regulation 17(1) of SEBI LODR with respect to composition of Board	The Company has not complied Regulation 17(1) of SEBI LODR with respect to composition of Board	The Company has complied as on the date of signing	-

Place: Mumbai
Date: 11/05/2022

For: M/s. Deep Shukla & Associates
Company Secretaries

Deep Shukla
{Proprietor}

FCS: 5652

CP NO. 5364

UDIN: F005652D000303642

