

SRIKANTH SANGAI
COMPANY SECRETARY IN PRACTICE

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Kachiguda, Hyderabad-27
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SECRETARIAL COMPLIANCE REPORT
OF
KSK ENERGY VENTURES LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2020

I, Srikanth Sangai, Company Secretary in Practice, have examined:

- (a) all the documents and records made available to us and explanation provided by KSK Energy Ventures Limited ("the listed entity")
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) all other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2020 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;
- (e)

Regulation 15(2A) and 15(2B) of SEBI(LODR) Regulations, 2015, the provisions as specified in regulation 17, 18, 19, 20 and 21 shall not be applicable during the insolvency resolution process period in respect of a listed entity which is undergoing corporate insolvency resolution process under IBC and the role and responsibilities of the Board of Directors and its committees as specified under regulation 17, 18, 19, 20 and 21 shall be fulfilled by the RP in accordance with sections 17 and 23 of the IBC.

- (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 our examination of those records.
- (c) The following are 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, debarmen t, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	Stock Exchanges	Delay in submission of financial results	Fine of Rs. 5,000 per day was levied by Stock Exchanges for period of delay in submitting financial results.	<p>The Company has submitted a letter for seeking waiver of fine levied by the Exchange for Non-Compliance with Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') for the quarter ended September 30, 2019.</p> <p>However, request for waiver of fine was not considered favorably by NSE's committee for review of penalties of the exchange and NSE has advised the Company to pay the fine vide its letter dated 23rd June, 2020.</p>

(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... (The years are to be mentioned)	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 applied to SEBI for extension of time for submitting the financial results with Stock Exchanges under Regulation 102 of SEBI(LODR), 2015. However SEBI has not granted extension and Company has conducted the Board Meeting on 14 th June, 2018 and submitted financial results to the Exchanges.	Financial year ended on 31.03.2019	The Company has paid penalty of Rs. 88,500/- separately to both Exchanges.	The Company has promptly paid the penalty to the Stock Exchanges.

Srikanth Sangai
 Company Secretary in Practice
 Mem. No: 20906
 CP No: 11113
 UDIN: A020906B000522517
 Place : Hyderabad
 Date: 29.07.2020