

Date: May 28, 2022

BSE Limited
Listing Department
P J Tower, Dalal Street,
Mumbai-400001
Maharashtra, India.

Madam/Sir,

Sub: Annual Secretarial compliance report for the year ended March 31, 2022 as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Please find enclosed the annual secretarial compliance report for the year ended March 31, 2021 pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the same on your records.

Thanking you,

For and on behalf of KLM Axiva Finvest Limited

Shibu Theckumpurathu Varghese
Wholetime Director
DIN: 02079917

**SECRETARIAL COMPLIANCE REPORT OF M/S. KLM AXIVA FINVEST LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022**

We have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. KLM Axiva Finvest Limited having CIN:U65910TG1997PLC026983 and having registered office at Door No. 3-3-408/1, First Floor, RTC Colony, Opposite SBI Bank, LB Nagar, Mansoorabad, Hyderabad, Rangareddi, Telanagana – 500074 (“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 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 **(there were no events requiring compliance during the Review Period)**;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**(there were no events requiring compliance during the Review Period)**;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(there were no events requiring compliance during the Review Period)**;
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (upto 12th August, 2021) & The Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021); **(there were no events requiring compliance during the Review Period)**;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (upto 15th August, 2021);
- (g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (upto 15th August, 2021);
- (h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August, 2021);
- (i) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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 in respect of matters specified below:

Sl. No.	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause)	Deviations	Observations / Remarks
1.	Regulation 54(2) of SEBI(LODR) Regulations, 2015 pertaining to disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the financial statements	Failed to disclose to the stock exchange in quarterly, half-yearly, year-to-date and annual financial statements, as applicable, the extent and nature of security created and maintained with respect to its secured listed non-convertible debt securities	The Listed Entity has disclosed the same in its Annual Report adopted by their members at AGM held on 31/08/2021 and informed the same to Stock exchange.

- (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 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:

Sl. 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	Non compliance of Regulation 54(2) of the LODR relating to disclose to the stock exchange in quarterly, half-yearly, year-to-date and annual financial statements, as applicable, the extent and nature of security created and maintained with respect to its secured listed non-convertible debt securities.	BSE Limited vide its email dated August 20, 2021 has imposed a fine of Rs. 47,000 for the year ended 31 st March, 2021.	The Listed Entity has paid fine on September 14, 2021 as imposed by BSE Limited.



- (d) The reporting of actions by the listed entity to comply with the observations made in previous report does not arise during the Review Period;
- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For NEKKANTI S.R.V.V.S. NARAYANA & CO.

Company Secretaries

ICSI Unique Code: S2009AP122301



(NEKKANTI S.R.V.V.S. NARAYANA)

Proprietor

M.No.F7157, C.P.No.7839

ICSI UDIN: **F007157D000407722**

Date : 27th May, 2022

Place : Hyderabad

