

**NITIN PRABHUNE**

B.Com. LL. B. F. C. S.

**PRACTISING COMPANY SECRETARY**

1st Floor, Flat no.102, A.J.Residency, Taware Colony, Pune - 411009

Phone: 020-29510658

email: nitinprabhunecs@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF KALYANI FORGE LIMITED FOR THE YEAR ENDED  
31<sup>ST</sup> MARCH, 2022**

To,

Kalyani Forge Limited

Shangrila Gardens C Wings 1<sup>st</sup> Floor

Opp Bund Garden Pune 411001

I have examined:

- a) all the documents and records made available to us either physically or electronically and explanation provided by Kalyani Forge 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 certification,

for the year ended 31<sup>st</sup> 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 ('LODR');
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements), Regulations, 2018 (**not applicable to the listed entity during the Review Period**);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 (**not applicable to the listed entity during the Review Period**);



- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(not applicable to the listed entity during the Review Period);**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(not applicable to the listed entity during the Review Period);**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(not applicable to the listed entity during the Review Period);**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder;

and based on the above examination, I 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:-

Sr. No	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
-	NIL	NIL	NIL

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- c) The company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated 18<sup>th</sup> October, 2019 in the terms of appointment of statutory auditor of the Company.
- d) 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
-	NIL	NIL	NIL	NIL



- e) 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 Office of Compliance Officer was vacant for the period 1 <sup>st</sup> April, 2020 to 3 <sup>rd</sup> August, 2020.	FY 2020-21	The entity has appointed Compliance Officer during FY 2020-21 w.e.f. 4 <sup>th</sup> August, 2020.	No comments are required as the entity has complied with the requirements of the Regulation 6(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Place: Pune  
Date: 27<sup>th</sup> May, 2022  
PRN: P2019MH077900  
UDIN: F006707D000400122

  
Nitin Prabhune  
Company Secretary  
FCS No: 6707  
CP No: 3800

