



**DINESH BIRLA & ASSOCIATES
COMPANY SECRETARIES**

**B-201, MSR Queenstown, Opp. Chinchwad Station,
Near Lokmanya Hospital,
Udyog Nagar, Chinchwad, Pune - 411033.
Mob. No. 9766693603 /7768893344
Email : csdineshbirla@gmail.com**

To,
The Board of Directors
Kinetic Engineering Limited
D 1 Block, Plot No. 18/2
Chinchwad, Pune 411019.

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2021-22

We have been engaged by **Kinetic Engineering Limited** (hereinafter referred to as 'the Company') bearing CIN: **L35912MH1970PLC014819** whose equity shares are listed on BSE Limited (Security Code: **500240**) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8thFebruary, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

**For Dinesh Birla & Associates
Company Secretaries**

**Dinesh Birla
Proprietor
FCS: 7658, CP No. : 13029
UDIN: F007658D000415661**

**Place: Pune
Date: May 28, 2022**



*Secretarial Compliance Report of Kinetic Engineering Limited
for the year ended 31st March, 2022*

I, Dinesh Shivnarayan Birla, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us either physically or by electronic mode and explanation provided by Kinetic Engineering 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 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;
- (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; - **Not applicable during the review period**



- (e) 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 and Sweat Equity) Regulations, 2021 with effect from 13th August 2021; -**Not applicable during the review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 upto 15th August 2021. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 with effect from 16th August, 2021;; - **Not applicable during the review period**
- (g) Securities and Exchange Board of India(Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013 upto 15th August, 2021. The Securities and Exchange Board of India(Issue and Listing of Non Convertible Securities) Regulations, 2021 with effect from 16th August, 2021; - **Not applicable 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 participants) Regulations, 2018;

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 matter referred below :

S.N.	Compliance Requirement (Regulations / circulars /guidelines including specific clause)	Detail of Deviations	Observations/ Remarks of the Practicing Company Secretary
Nil	Nil	Nil	Nil

- (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 violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observation/ remarks of the Practicing Company Secretary, if any.
NIL	NIL	NIL	NIL	NIL

- (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
Nil	Nil	Nil	Nil

**For Dinesh Birla & Associates
Company Secretaries**

**Dinesh Birla
Proprietor
FCS: 7658, CP No. : 13029
UDIN: F007658D000415661**

**Place: Pune
Date: May 28, 2022**