



Keerthi Industries Limited

(Formerly Suvarna Cements Limited)

Registered Office & Administrative Office : Plot No. 40, IDA, Balanagar, Hyderabad - 500 037.
Tel : 23076538, 23076539, Fax : 91-040-23076543, E-mail : general@keerthiindustries.com,
keerthiitd@gmail.com | CIN : L11100TG1982PLC003492 | GSTIN : 36AAFCS3938P1ZO

Date: 17.05.2024

To,
The General Manager
Department of Corporate services
The BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, M Samachar Marg, Fort
Mumbai, Maharashtra 400001

Script code: 518011

Dear Sir/Madam

Sub: Submission of Secretarial Compliance Report for the year ended March 31, 2024

Pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we submit herewith a copy of Secretarial Compliance Report dated May 17, 2024 issued by M/s. VCSR & Associates., Company Secretaries, Hyderabad for the financial year ended March 31, 2024.

This is for the information of the Exchange.

Kindly take the same on record.

Thanking you,
Yours Truly,
For **Keerthi Industries Limited**

Ashdeep Kaur
Company Secretary & Compliance Officer

**SECRETARIAL COMPLIANCE REPORT
OF
M/S KEERTHI INDUSTRIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31.03.2024**

We, VCSR & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. KEERTHI INDUSTRIES LIMITED having its Registered office at Plot No.40, IDA Balanagar, Hyderabad, Hyderabad, Telangana, India, 500037, hereinafter referred to as "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 Report.

for the financial year ended 31.03.2024 ("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 there under by the SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (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) Securities and Exchange Board of India (Buyback 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 and Sweat Equity) Regulations, 2021; (Not applicable to the Listed Entity during the review period); Securities and Exchange Board of India (Issue and Listing of NonConvertible Securities) Regulations, 2021; (Not applicable to the Listed Entity during the review period); Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

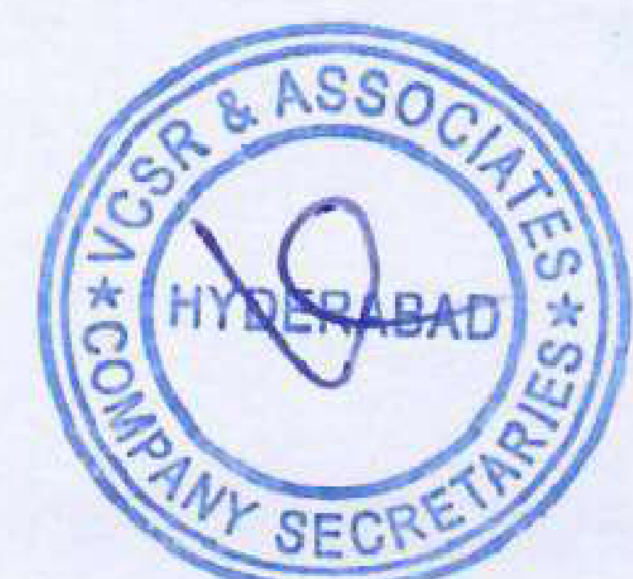
(f) other regulations as applicable.

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:

Sr.No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary (PCS)	Management Response	Remarks
1	Filling of vacancy in the office of the Compliance Officer.	Regulation 6 of the SEBI [LODR] Regulations, 2015.	Vacancy has not been filled up with in the time specified.	No action has been taken till the date.	No action has been taken till the date.	Vacancy in the office of the Compliance Officer has been filled by the listed entity at the date later than three	----	Date of vacancy is 07.11.2023 and date of filling vacancy is 06.03.2024. Any vacancy in the office of the Compliance Officer	Management has been in constant search for identifying the desired candidate for the position of	vacancy in the office of the Compliance Officer has been filled by the listed entity on



						months from the date of such vacancy.	shall be filled by the listed entity at the earliest and in any case not later than three months from the date of such vacancy. It was observed that listed entity has filled up the vacancy at the date later than three months from the date of such vacancy.	Company Secretary of the Company. Hence as the Company was in the process of selecting the desired candidate.	06.03.2024 at the date later than three months from the date of such vacancy.
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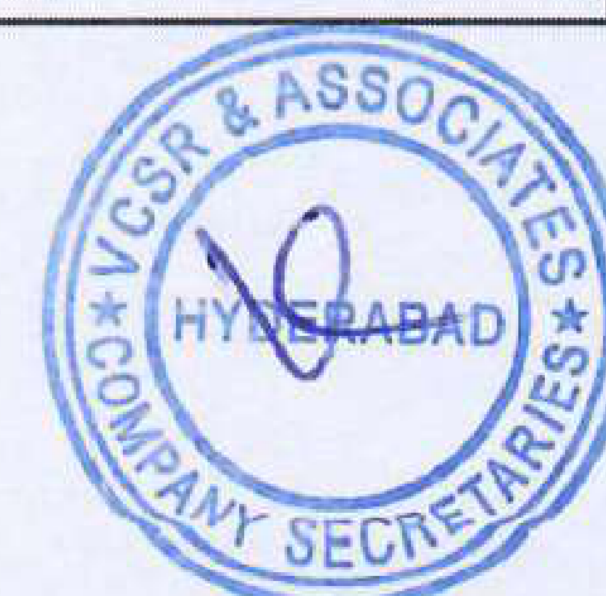
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial Compliance report for the year ended 31.03.2023	Compliance Requirement (Regulations/ circulars/ Guidelines Including Specific clause)	Details of violation / deviations and actions taken / penalty imposed , if any, on the listed entity	Remedial actions, if any, taken by the listed Entity	Comments of the PCS on the actions taken by the listed entity
There were no observations made in previous report						

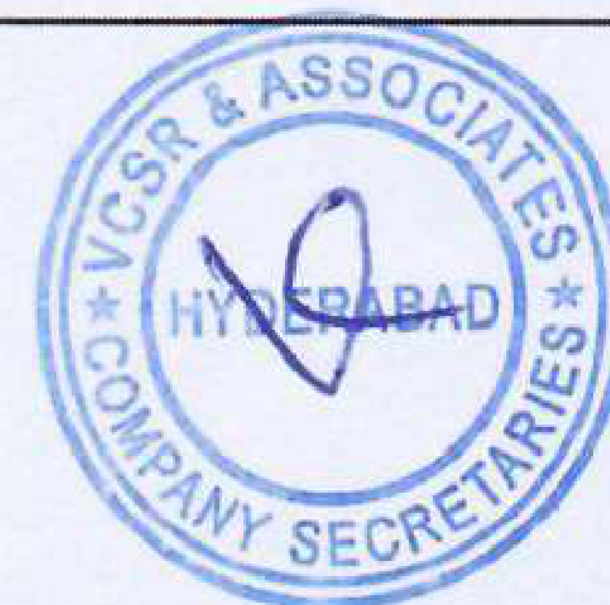


- i. we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	The company has complied secretarial standards.
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. ● All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI. 	Yes	The company is updating the policies timely.
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> ● The listed entity is maintaining a functional website. ● Timely dissemination of the documents/information under a separate section on the website. ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website. 	Yes	The company has maintained the website and timely updated the information.



4.	<p>Disqualification of Director(s):</p> <p>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	No	None of the Director(s) are disqualified under Section 164 of the Companies Act, 2013
5.	<p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	Yes	The Company is not having any material subsidiary Companies
6.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	The company has followed proper procedures for Preservation of Documents.
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	The Company has conducted performance evaluation.
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of audit committee for all related party transactions;</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.</p>	Yes	The Company has taken necessary approval from the Committee and Board for Related Party Transactions.



9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	The Company has disclosed necessary information Within time limits as prescribed.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	Complied
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	No	No action has been taken by SEBI or by Stock Exchanges.
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	NA	During the Period no Change



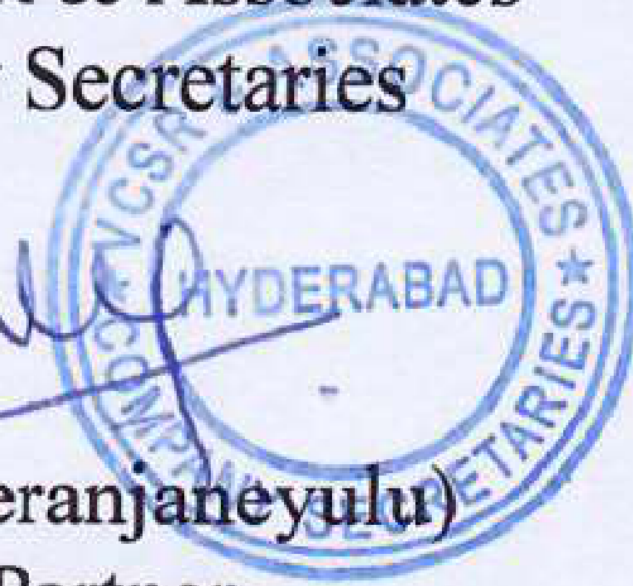
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	No	The Company has Complied all compliances
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Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For VCSR & Associates
Company Secretaries


(Ch. Veeranjanyulu)
Partner



M No. F6121; C P No.: 6392
UDIN: F006121F000388239
Peer Review No: 751/2020

Place: Hyderabad
Date: 17.05.2024