

June 1, 2022

To,
The Manager,
DCS - CRD
BSE Limited
Dalal Street
Mumbai 400 001

Scrip Code: 501700 - ISIN: INE131H01028

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2022

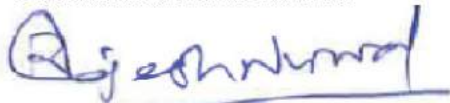
Dear Sir,

With reference to the captioned subject and pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are submitting herewith the Annual Secretarial Compliance Report for the year ended March 31, 2022 obtained from M/s. K R Saini & Associates, Practicing Company Secretaries.

Kindly take the same on your records and acknowledge the receipt of the same.

Thanking you.

Yours faithfully,
For **IndiaNivesh Limited**



Rajesh Nuwal
Managing Director
DIN: 00500191

K R SAINI & ASSOCIATES

PRACTISING COMPANY SECRETARIES

SHOP NO. 07, KUBER COMPLEX, OPPOSITE POLICE HEADQUARTER, LALKOTHI,
JAIPUR, RAJASTHAN-302015

E-mail: krsainiassociates@gmail.com

Contact No.: +91 70142 18537

SECRETARIAL COMPLIANCE REPORT OF INDIANIVESH LIMITED

FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2022

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,

IndiaNivesh Limited

CIN: L99500MH1931PLC001493

1703, 17th Floor, Lodha Supremus

Senapati Bapat Marg, Lower Parel

Mumbai – 400013.

~~1/~~We have examined:

- (a) all the documents and records made available to us and explanation provided by IndiaNivesh 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;

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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company 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 Company during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company 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 Company 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, 1996;
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:-

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

During the year under review, there were no penalty levied or action taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges. Also BSE has approved Waiver Application which was levied in previous year for various Non-Compliances/ Delay in Compliances by the Company.

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				

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(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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entities
1	Delay in filing of Audited Financial Results for the year ended March 31, 2020 and Un-audited Financial Results for the Quarter ended June 30, 2020 and Quarter/Half Year Financial Results for the Quarter ended September 30, 2020.	March 31, 2021	Audited Financial Results for the year ended March 31, 2020 and Un-audited Financial Results for the Quarter ended June 30, 2020 and Quarter/Half Year Financial Results for the Quarter ended September 30, 2020 was duly approved and filed with exchange.	The Company has filed Audited Financial Results for the year ended March 31, 2020 and Un-audited Financial Results for the Quarter ended June 30, 2020 and Quarter/Half Year Financial Results for the Quarter ended September 30, 2020.
2	Delay in appointment of Company Secretary	March 31, 2021	Company Secretary and Compliance Officer was appointed w.e.f. 13.02.2020.	The Company has appointed Company Secretary and Compliance Officer w.e.f. 13.02.2020.
3	Delay in filing Investor Complaints for the Quarter ended September 30, 2020	March 31, 2021	Investor Complaints for the Quarter ended September 30, 2020 was duly filed with the exchange	There was a delay of 1 day in filing of Investor Complaints for the Quarter ended September 30, 2020. However the same was complied with.
4	Delay in filing of Related Party Transactions for the Half year ended September 30, 2020.	March 31, 2021	Related Party Transactions for the Half year ended September 30, 2020 was duly filed with	The Company has duly filed Related Party Transactions for the Half year ended September 30, 2020.

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			exchange.	
5	Composition of the Board.	March 31, 2021	The Company has appointed Directors as per the provisions of SEBI LODR	As on March 31, 2022, the Composition of the Board is as per the provisions of SEBI LODR.

**For K R SAINI & ASSOCIATES
Practising Company Secretary**

Rajkumar Saini

**Rajkumar Saini
(Proprietor)
Membership No. 66305
COP No. 24697**



Date: 01.06.2022

Place: Jaipur

UDIN: A066305D000450150