SECRETARIAL COMPLIANCE REPORT

OF

KSK ENERGY VENTURES LIMITED

FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2020

I, Srikanth Sangai, Company Secretary in Practice, have examined:

(a) all the documents and records made available to us and explanation provided by KSK Energy Ventures Limited (“the listed entity”)
(b) the filings/ submissions made by the listed entity to the stock exchanges,
(c) website of the listed entity,
(d) all other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March 2020 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;
(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
(i) (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 applicable provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

<table>
<thead>
<tr>
<th>Sr. No</th>
<th>Compliance Requirement (Regulations/circulars / guidelines including specific clause)</th>
<th>Deviations</th>
<th>Observations/ Remarks of the Practicing Company Secretary</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Regulation 33 of SEBI (LODR), 2015</td>
<td>Delay in submission of financial results</td>
<td>The Company has submitted financial results for the quarter and half year ended 30th September 2019 &amp; Limited Review Report to the Exchanges on 18th November, 2019 with four days delay.</td>
</tr>
</tbody>
</table>

Note: Corporate Insolvency Resolution Process (CIRP) has been initiated in the listed entity under Section 7 of the Insolvency and Bankruptcy Code, 2016 (IBC) by order of Hon’ble National Company Law Tribunal (NCLT), Hyderabad dated 4th September 2019. Mr. Sai Ramesh Kanuparthi was appointed as Interim Resolution Professional (IRP) with effect from September 04, 2019 under the provisions of Insolvency and Bankruptcy Code, 2016 (IBC) and was later appointed as Resolution Professional (RP) by the Committee of Creditors on 11th October, 2019. The Powers of Board of Directors was suspended by virtue of NCLT order in accordance with Section 17(1)(b) of the IBC and exercised by the RP. As per
Regulation 15(2A) and 15(2B) of SEBI(LODR) Regulations, 2015, the provisions as specified in regulation 17, 18, 19, 20 and 21 shall not be applicable during the insolvency resolution process period in respect of a listed entity which is undergoing corporate insolvency resolution process under IBC and the role and responsibilities of the Board of Directors and its committees as specified under regulation 17, 18, 19, 20 and 21 shall be fulfilled by the RP in accordance with sections 17 and 23 of the IBC.

(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 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:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Action taken by</th>
<th>Details of violation</th>
<th>Details of action taken E.g. fines, warning letter, debarment, etc.</th>
<th>Observations/ remarks of the Practicing Company Secretary, if any.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Stock Exchanges</td>
<td>Delay in submission of financial results</td>
<td>Fine of Rs. 5,000 per day was levied by Stock Exchanges for period of delay in submitting financial results.</td>
<td>The Company has submitted a letter for seeking waiver of fine levied by the Exchange for Non-Compliance with Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘Listing Regulations’) for the quarter ended September 30, 2019. However, request for waiver of fine was not considered favorably by NSE’s committee for review of penalties of the exchange and NSE has advised the Company to pay the fine vide its letter dated 23rd June, 2020.</td>
</tr>
</tbody>
</table>
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

<table>
<thead>
<tr>
<th>Sr. No.</th>
<th>Observations of the Practicing Company Secretary in the previous reports</th>
<th>Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)</th>
<th>Actions taken by the listed entity, if any</th>
<th>Comments of the Practicing Company Secretary on the actions taken by the listed entity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The Company has applied to SEBI for extension of time for submitting the financial results with Stock Exchanges under Regulation 102 of SEBI(LODR), 2015. However SEBI has not granted extension and Company has conducted the Board Meeting on 14th June, 2018 and submitted financial results to the Exchanges.</td>
<td>Financial year ended on 31.03.2019</td>
<td>The Company has paid penalty of Rs. 88,500/- separately to both Exchanges.</td>
<td>The Company has promptly paid the penalty to the Stock Exchanges.</td>
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</table>

Srikanth Sangai
Company Secretary in Practice
Mem. No: 20906
CP No: 11113
UDIN: A020906B000522517
Place: Hyderabad
Date: 29.07.2020