



SUBHASH KUMAR & CO.

(COMPANY SECRETARIES)

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SECRETARIAL COMPLIANCE REPORT OF COVIDH TECHNOLOGIES LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021.

To,
The Members of
M/s. **COVIDH TECHNOLOGIES LIMITED**
B-2, Plot: 797/A, Sai Krishna Building,
Road No. 36, Jubilee Hills,
Hyderabad-500033.

I, **CS Subhash Kumar**, Proprietor of **M/s. Subhash Kumar & Co.** have examined:

- all the documents and records made available to us and explanation provided by M/s. **COVIDH TECHNOLOGIES LIMITED**, having its Registered Office at B-2, Plot: 797/A, Sai Krishna Building, Road No. 36, Jubilee Hills, Hyderabad-500033, Telangana, India, hereinafter referred to as "**the listed entity**",
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2021 ("Review Period") in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (**Not applicable to the company during the audit period**)
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not applicable to the company during the audit period**)



- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the audit period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the audit 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 audit period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(Not applicable to the company during the audit period)**
- i) SEBI (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the company during the audit period)**
- j) SEBI (Delisting of Equity Shares) (Amendment) Regulations, 2016; **(Not applicable to the company during the audit period)**
- k) SEBI (Investor Protection and Education Fund) Regulations, 2009; **(Not applicable to the company during the audit period)**

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)	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/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:

S. 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	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 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL	NIL	Company is under Insolvency Resolution Process.	NIL	NIL

Thanking you,

For **SUBHASH KUMAR & CO.**
(Company Secretaries)

Place: New Delhi
Date: 29.04.2021




(CS Subhash Kumar)
Proprietor
(M. No. 47430)
(CP No. 21421)
UDIN: A047430C000209361