

**Secretarial Compliance Report  
of  
KARMA ENERGY LIMITED  
for the year ended 31<sup>st</sup> March 2022**

We Martinho Ferrao & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Karma Energy 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 financial year ended on 31<sup>st</sup> 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 (LODR);
- (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 (SAST);
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not applicable during the year under review**

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: **Not Applicable as the Company has not provided any share based benefits to the employees during the year under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: **Not applicable as the Company has not issued any debt securities during the financial year under review.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: **Not applicable as the Company has not issued any such securities during the financial year under review.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 as applicable to it.
- (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) There are no 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.
- (d) 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 report (31 <sup>st</sup> March 2021)	Actions taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<i>The Board meeting for adoption of Annual Accounts for year ended March 31, 2020 was held on 10.08.2020 as against the due date of 31.07.2020 and there was also a delay in filing Related Party Returns as per Reg 23(9) of SEBI LODR. The stock exchanges</i>	<i>The Company had made representation to both the stock exchanges in this regard after which the fine was waived</i>	<i>As explained by the Management, there was a delay in compliance due to Covid-19 striking the Key Accounts Personnel and his spouse and that too at a critical time in June 2020 when Accounts were under</i>

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous report (31 <sup>st</sup> March 2021)	Actions taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	<i>imposed fine on the Company for the non-compliance.</i>		<i>finalization and the unique situation of then prevalent pandemic and the State and Country touching new peaks every day causing great concern to the health and safety of people in general and Company personnel in particular.</i>

(e) The listed entity has complied with the requirements of paragraph 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019. There has been no resignation of Statutory Auditors in FY 2021-22.

**For Martinho Ferrao & Associates**

**Company Secretaries**



**Martinho Ferrao**

**Proprietor**

**FCS No.: 6221**

**C P No.: 5676**

**PR 951/2020**

**UDIN: F006221D000380452**



Place: Mumbai

Date: 24<sup>th</sup> May 2022