



KAUSHAL INVESTMENTS LIMITED

"JAJODIA TOWER", 4th Floor, Room No. D-8, 3, Bentinck Street, Kolkata - 700 001
Phone : 2248-5664, E-mail : info@kaushalinvest.com, Website : www.kaushalinvest.com

CIN : L65993WB1981PLC033363

Date: 14/05/2022

To,
The Secretary,
The Calcutta Stock Exchange Limited,
7, Lyons Range,
Kolkata - 700001

Scrip Code: 021131

Sub: Submission of Annual Secretarial Compliance Report for the Year Ended 31st March, 2022

Dear Sir/Madam,

With reference to the abovementioned subject, please find enclosed herewith the Annual Secretarial Compliance Report of Kaushal Investments Limited for the Year Ended March 31, 2022 as certified by CS Rajesh Ghorawat, Practicing Company Secretary.

This Report has been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and records.

Thanking you,

Yours faithfully,

For Kaushal Investments Ltd

Radhika Maheshwari

**Radhika Maheshwari
Company Secretary & Compliance Officer**

Encl: As above

RAJESH GHORAWAT

PRACTISING COMPANY SECRETARY

**68, R. K. CHATTERJEE ROAD,
KASBA BAKULTALA, 3RDFLOOR,
KOLKATA-700042
MOBILE- 9836029000
Email Id-rgadvisory18@gmail.com**

SECRETARIAL COMPLIANCE REPORT OF KAUSHAL INVESTMENTS LTD FOR THE YEAR ENDED MARCH 31, 2022

To,
Kaushal Investments Ltd
"Jajodia Tower"
4th Floor, Room No. D-8
3, Bentinck Street
Kolkata - 700001

I, Rajesh Ghorawat, Practicing Company Secretary, have examined:

- a) all the documents and records made available to me and explanation provided by **Kaushal Investments Ltd** ("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 **March 31, 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, **to the extent of Acts/ Provisions of the Acts applicable to the company** 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; (*Not applicable during the review period*)
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (*Not applicable during the review period*)
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*Not applicable during the review period*)

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- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable during the review period)*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable 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 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 Participant) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulation, 1993; and circulars/ guidelines issued thereunder;

and based on the above examination I 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 the matter as specified below:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Non-Compliance of Regulation 13(3) of SEBI (LODR) Regulation, 2015 for the quarter ended June 2021.	The Company has erroneously uploaded the Compliance for Regulation 13(3) under the Document ID 23.1 instead of 17.1	The Company took immediate action on this matter and informed the CSE Limited, via mail dated 04/01/2022 that the company has uploaded the Compliance for the Regulation 13(3) on time and have mailed the same to listingcompliance@cse-india.com but while uploading, the said document was erroneously uploaded under the

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			Document ID 23.1 instead of 17.1. The Company thereof requested the CSE Limited to consider the same upload as Compliance of the Provision under Document ID 17.1. CSE Limited via mail dated 10/01/2022 accepted the aforesaid request and removed the fine.
2	Non-Compliance of Regulation 33 & 44 of SEBI (LODR) Regulation, 2015 for the Financial Year 2020-21.	As per the CSE Limited the company had failed to upload the compliance document on the portal. The Company has mailed the Compliance document under Regulations 34 & 44 to CSE Limited for the FY 2020-21.	The Company took immediate action on this matter and informed the CSE Limited via mail dated 15/02/2022 that the Compliance under Regulations 34 & 44 were mailed to the Stock Exchange on the mail id listingcompliance@cse-india.com as there was no such tab available on the portal to upload the Compliance under Regulation 34 and compliances via emails were accepted at that time. The Company also requested to consider the same as complied and allow it to upload the same on the portal for the year 2020-21 and after considering the request CSE Limited removed the amount showing as due on their portal.

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- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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 in so far as it appears from my examination of those records.

Sl. No.	Action Taken By	Details of Violation	Details of Action taken e.g., fines, warning letter, debarment, etc.	Observations/Remarks of Practising Company Secretary, if any
1	CSE	Compliance Document for Regulation 13(3) for the quarter ended June 2021 was erroneously uploaded under different head	CSE Limited prima facie imposed fine along with the disclaimer to provide requisite proof that the compliance was done within time line mentioned in the SEBI (LODR) Regulations, 2015.	Company took immediate action and informed the CSE Limited about the error and thereafter CSE Limited had waived off the fine and confirmed the same via mail dated 10/01/2022.
2	CSE	The Company failed to upload the Compliance Document under Regulations 33 & 44 of SEBI (LODR) Regulations, 2015 on the CSE	CSE Limited prima facie imposed fine along with the disclaimer to provide requisite proof that the compliance was done on time.	Company took immediate action and informed the CSE Limited about the timely compliance through the designated email id listingcompliance@cse-india.com . The matter was reviewed by CSE Limited and accordingly fine was removed.

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		Portal		
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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 Practising Company Secretary in the Previous Reports	Observation made in the Secretarial Compliance report for the year ended 31 st March, 2021	Actions taken by the Listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
NIL				



Rajesh Ghorawat
Practising Company Secretary
M.No. F7226
CP No. 20897

Date: 14th May, 2022
Place: Kolkata

ICSI Peer Review No.: 1992/2022
UDIN: F007226D000320407