

Date: July 31, 2020

Listing Department  
BSE Limited,  
Phiroze jeejeebhoy Towers,  
Dalal Street, Mumbai -400001

Sub: Submission of Secretarial Compliance Report for the year ended March 31, 2020

Dear Sir/Madam,

We are enclosing herewith the Secretarial Compliance Report for the year ended on March 31, 2020 for the exchange to take on record.

Thanking you,

For Vaarad Ventures Limited

Sd/-  
Leena Doshi  
Managing Director

**Secretarial Compliance Report of VAARAD VENTURES LIMITED**  
**For the Year Ended 31st March 2020**

To,  
The Members,  
VAARAD VENTURES LIMITED  
2F Court Chambers 35, Vitthaladas Thackarsey Marg,  
New Marine Lines, Behind Income Tax Office,  
Mumbai, Mumbai City - 400020

We have examined

All the documents and records made available to us and explanation provided by VAARAD VENTURES LIMITED (The Company);

- (i) The filings/submissions made by the listed entity to the stock exchanges
- (ii) Website of the listed entity,
- (iii) Any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31<sup>st</sup> 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:-

- (iv) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (v) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment.
- (vi) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (‘SEBI Act’):
  - 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 - **(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;
  - 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;

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 (Regulations / guidelines including clause)	Requirement / circulars / specific	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:

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				

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 31st March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

*\*We hereby further report that the company has filed the share capital reconciliation report one day late for the quarter ended 30<sup>th</sup> September 2019 31st December 2019. The company official has explained that this is due to a technical error.*

**For Kushla Rawat & Associates**  
**Company Secretaries**  
**Firm Registration No: I2013MH1092100**

KUSHLA Digitally signed by  
KUSHLA RAWAT  
RAWAT Date: 2020.07.31  
19:03:00 +05'30'

**(Kushla Rawat)**  
**ACS No: 33413, COP No: 12566**  
**UDIN: A033413B000507911**

**Place: Mumbai**  
**Date: 31/07/2020**