

P. P SINGH & CO.
PRACTICING COMPANY SECRETARIES

To,
The Board of Directors,
Kopran Limited,
CIN: L24230MH1958PLC011078
Parijat House, 1076, Dr. E. Moses Road,
Worli, Mumbai - 400018.

SUBJECT: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2022

Dear Sir,

We have been engaged by **KOPRAN LIMITED** (hereinafter called the "**Company**") bearing **CIN: L24230MH1958PLC011078** whose equity shares are listed on National Stock Exchange of India Limited and BSE Limited to conduct an audit in terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with Securities and Exchange Board of India's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable Securities Exchange Board of India (hereinafter called "**SEBI**") Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For P.P SINGH & CO.

Pushpendra Pratap Singh

PUSHPENRDA PRATAP SINGH
Practicing Company Secretary



UDIN: F011584D000399061

Membership No.: F11584

COP No.: 15570

Place: Mumbai

Date: May 27, 2022

712-714, C- Wing, Trade World, Kamla Mill Compound,
Senapati Bapat Marg, Lower Parel, Mumbai - 400013
Contact: +91 7208273964
PAN: BTKPS3852C

**SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2022**

We, P. P Singh & Co., Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **KOPRAN LIMITED** (hereinafter called 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,
- (e) books, papers, minute books, forms and returns filed;

for the year ended March 31, 2022 (hereinafter referred to as the "Review Period") in respect of compliance with the provisions of:

- i. the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as the "SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- ii. the Securities Contracts (Regulation) Act, 1956 (hereinafter referred to as the "SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (hereinafter referred to as the "SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:

- i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iv. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not Applicable to the Listed Entity during the Review Period as the Listed Entity has not undertaken buy back of its securities**);
- v. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not Applicable to the Listed Entity during the Review Period as the Listed Entity has not provided any share based benefits to its employees**);



- vi. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Listed Entity during the Review Period);**
- vii. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- viii. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not Applicable to the Listed Entity during the Review Period as the Listed Entity has not undertaken delisting activity);**
- ix. 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.
- 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 were 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 in so far as it appears from mv examination of those records.
- d. The reporting of actions by the Listed Entity to comply with the observations made in previous reports does not arise during the Review Period.

FOR P.P SINGH & CO.

Rushendra Pratap Singh

PUSHPENRDA PRATAP SINGH
Practicing Company Secretary



UDIN: F011584D000399061

Membership No.: F11584

COP No.: 15570

Place: Mumbai

Date: May 27, 2022