

June 28, 2021

The Manager
The Department of Corporate Services
BSE Limited
P. J. Towers,
Dalal Street, Mumbai - 400 001
Scrip Code - 540775

The Manager
The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400 051
Symbol - KHADIM

Dear Sir / Madam,

Ref: Annual Secretarial Compliance Report

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find enclosed the Annual Secretarial Compliance Report of Khadim India Limited, dated June 17, 2021 for the financial year ended March 31, 2021, duly certified by Mr. Binod Kumar Gupta (CP No. 3242) Partner, BKG & Company, Company Secretaries.

Kindly take the same on your records.

Thanking You,

Yours faithfully,

Khadim India Limited

Company Secretary & Head - Legal

ICSI Membership No. A21358

Encl: As above

KHADIM INDIA LIMITED

REGD. OFFICE: 'KANKARIA ESTATE' 5TH FLOOR, 6, LITTLE RUSSELL STREET
KOLKATA-700 071, INDIA, Tel No. +91-33-4009 0501, Fax No. + 91-33-4009 0500
E-mail: compliance@khadims.com; Website: www.khadims.com
CIN: L19129WB1981PLC034337

**Secretarial Compliance Report
of
KHADIM INDIA LIMITED
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021**

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

To,
The Members,
KHADIM INDIA LIMITED
“Kankaria Estate”, 5th Floor
6, Little Russell Street,
Kolkata-700071

We **BKG & Company** have examined:

- (a) all the documents and records made available to us and explanation provided by **KHADIM INDIA LIMITED (CIN - L19129WB1981PLC034337)** (“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 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of :
 - i. the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - ii. 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;
- (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 (Share Based Employee Benefits) Regulations, 2014;
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (f) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulation, 1993;
- (g) Securities and Exchange Board of India (Depository Participants) Regulation, 1996 & 2018;
- (h) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the listed entity during the Review Period)
- (i) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the listed entity during the Review Period)
- (j) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period)
- (k) any other regulation and circulars / guidelines issued thereunder as applicable to the listed entity;

and based on the above examination and considering the various relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 Pandemic, We hereby report that, during the Review Period:

- i. 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
None			

- ii. 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.
- iii. 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
None				

- iv. 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 financial year ended March 31, 2020.	Action taken by the Listed Entity, if any	Observations / remarks of the Practicing Company Secretary, if any
NOT APPLICABLE				

For **B K G & COMPANY**
Company Secretaries

BINOD KUMAR GUPTA
Digitally signed by
BINOD KUMAR GUPTA
Date: 2021.06.17
13:26:43 +05'30'

(BINOD KUMAR GUPTA)
Partner
(ACS-12965, C. P. No.- 3242)
UDIN: A012965C000480465

Place: Kolkata
Date: 17/06/2021