

# KNR TIRUMALA INFRA PVT. LTD.

May 30, 2022

Vice President

Listing Department

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G,

Bandra Kurla Complex, Bandra (E)

Mumbai – 400051

Ref:

Security Code No.: KNRT35 (ISIN: INE01NS07019)

KNRT35A (ISIN: INE01NS07027)

Re : Secretarial Compliance Report for year ended 31st March 2022

Dear Sir/Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report for the year ended March 31, 2022 from practicing Company Secretaries, M/s Manjeet Bucha & Associates

This is for your information and record please.

Thank you.

Yours faithfully,

For KNR Tirumala Infra Private Limited



Sanjay Kumar

Company Secretary

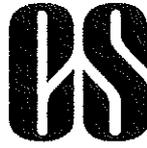
M. No. A37163

Regd. Off: KNR House, 4<sup>th</sup> Floor, Plot No. 114, Phase -I, Kavuri Hills, Hyderabad – 500033

Corporate Off: Unit No.1901, 19th Floor, Tower B, World Trade Tower, Plot No.C-1, Sector 16, Noida-201301 (UP)

Phone: 040- 4026 8761 / 62, Fax: +91 40 4026 8760 E-mail: [Compliance@ktiplt.co.in](mailto:Compliance@ktiplt.co.in)

CIN: U45500TG2018PTC123857



**SECRETARIAL COMPLIANCE REPORT OF KNR TIRUMALA INFRA PRIVATE LIMITED**  
**FOR THE YEAR ENDED MARCH 31, 2022**

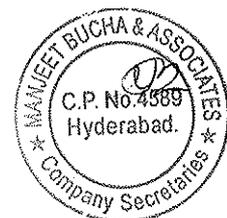
To,  
The Board of Directors  
KNR Tirumala Infra Private Limited ("the Company")  
KNR House, 4th Floor, Plot No.114,  
Phase-I, Kavuri Hills, Hyderabad,  
Telangana - 500033  
[CIN: U45500TG2018PTC123857]

We, Manjeet Bucha & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by KNR Tirumala Infra Private Limited ("the Listed Entity" / "the Company"),
- (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 and the Regulations, circulars, guidelines issued thereunder; and
  - (b) the Securities Contracts (Regulation) Act, 1956, 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) the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022)*
- (b) the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*
- (c) the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*
- (d) the Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*



- (e) the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*
- (f) the Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*
- (h) the Depositories Act, 1996 and the Regulations and Bye Laws framed thereunder to the extent of Regulation 76 of the Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018 *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022);*
- (i) the Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulation, 1993 regarding the Companies Act, 2013 and dealing with the client to the extent of securities issued *(Not applicable since the Company is not registered as Registrar to Issue and Share Transfer Agent during the Review Period);* and
- (j) the Securities and Exchange Board of India (Investor Education and Protection Fund) Regulations, 2009 *(Not applicable to the Company during the Review Period as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022).*

and based on the above examination, we hereby report that, during the Review Period:

- (a) Though the Company applied for Listing of its Non-Convertible Debentures ('NCDs') on April 12 2022, NCDs got listed at the NSE on April 18, 2022. Further, the Company is a 'high value debt listed entity' as the value of outstanding listed NCDs is more than Rupees Five Hundred Crores.
- (b) The Listed Entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (c) 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.
- (d) 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.



- (e) The Listed Entity has taken the following actions to comply with the observations made in previous reports:

Sl. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
Not Applicable as Non-convertible Debentures of the Company got listed at the NSE on April 18, 2022				

**For Manjeet Bucha & Associates,  
Company Secretaries**

*Manjeet Bucha*

**Manjeet Bucha  
Proprietor**

Membership No.: F8305  
COP No.: 4589



Peer Review No.: 874/2020

UDIN: F008305D000390511

Place: Hyderabad

Date: 25.05.2022