



**Secretarial Compliance Report of Magnum Ventures Limited  
for the Financial Year ended 31<sup>ST</sup> March, 2020**

We, M/s. Munish K Sharma & Associates, Practising Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Magnum Ventures Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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 **31<sup>st</sup> March, 2020** ("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") and 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: *Not applicable as there was no such transaction during the review period.*
- (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 as there was no such transaction during the review period.*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: *Not applicable as there was no such transaction during the review period.*



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: *Not applicable as there was no such transaction 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 as there was no such transaction 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 Participants) Regulations, 2018,

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 applicable 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
1.	Regulation 33(1)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	High	<i>The limited review reports or audit reports submitted to the stock exchange(s) given by the auditor who has not subjected himself to the peer review process of Institute of Chartered Accountants of India and do not hold a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India.</i>
2.	Regulation 34(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Medium	<i>The listed entity has submitted the Annual Report along with the notice of the Annual General Meeting for the Financial Year 2018-19 to the stock exchange(s), later of the commencement of dispatch of</i>



			<i>aforesaid report to its shareholders.</i>
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(b) The listed entity has maintained proper records under the provisions of the above applicable Regulations and circulars/ guidelines issued thereunder insofar as it appear 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:

<b>Sr. No</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
<b>Nil</b>				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

<b>Sr. No</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended 31.03.2019</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1.	Not Applicable	<i>Financial Statements for the year ended 31<sup>st</sup> March, 2018 published in the Annual Report and circulated to the stakeholders of the Company were not as per Indian Accounting Standards applicable to the Company.</i>	No action required	Not Applicable



		However, to rectify this inadvertent mistake, the management have circulated the correct Financial Statements as per Indian Accounting Standards to the shareholders present in the 38 <sup>th</sup> Annual General Meeting dated 22 <sup>nd</sup> September, 2018.	
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**For Munish K. Sharma & Associates  
Company Secretaries**



*Vijay Sharma*

**CS Vijay Kumar Sharma  
Partner**

**M. No.: F9924**

**C.P. No. 12387**

**UDIN: F009924B000538331**

Place: **Kaushambi, Ghaziabad**

Date: **31<sup>st</sup> July, 2020**