



Secretarial Compliance Report of Magnum Ventures Limited
for the financial year ended 31st March, 2021

We, M/s. Munish K Sharma & Associates, Practicing 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 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:

- (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 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Low	<i>The listed entity had filed the statement of Grievance Redressal Mechanism to the stock exchange(s) for the quarter ended June, 2020 by delay of one day.</i>
3.	Regulation 31(1)(b) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Low	<i>The listed entity had filed the shareholding pattern to the stock exchange(s) for the quarter ended June, 2020 by</i>



			<i>delay of one day.</i>
4.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Medium	<i>The listed entity had filed reconciliation of share capital audit report to the stock exchange(s) for the quarter ended June, 2020 by delay of twenty-two days.</i>
5.	Circular No.: SEBI/HO/CFD/CMD1/CIR/P/2020/84 read with Regulation 30(4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	High	<i>The listed entity had not filed the disclosure of material impact of COVID-19 pandemic to the stock exchange(s).</i>

(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:

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.
1.	Bombay Stock Exchange (BSE)	Reg. 13(3) of SEBI (LODR) Regulations, 2015 – Delay of one day in filing of <i>Grievance Redressal Mechanism to the stock exchange(s) for the quarter ended June, 2020.</i>	Fine of Rs. 1,000/-	<i>The listed entity had paid the fine imposed by BSE for the said default.</i>
2.	National Stock Exchange (NSE)	Reg. 13(3) of SEBI (LODR) Regulations, 2015 – Delay of one day in filing of <i>Grievance Redressal Mechanism to the stock exchange(s)</i>	Fine of Rs. 1,000/-	<i>The listed entity had paid the fine imposed by NSE for the said default.</i>

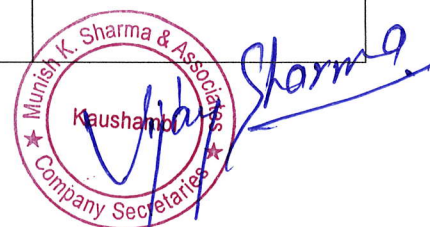


Sharma

		<i>for the quarter ended June, 2020.</i>		
3.	Bombay Stock Exchange (BSE)	Reg. 31(1)(b) of SEBI (LODR) Regulations, 2015 – Delay of one day in filing of shareholding pattern to the stock exchange(s) for the quarter ended June, 2020.	Fine of Rs. 2,000/-	<i>The listed entity had paid the fine imposed by BSE for the said default.</i>
4.	National Stock Exchange (NSE)	Reg. 31(1)(b) of SEBI (LODR) Regulations, 2015 – Delay of one day in filing of shareholding pattern to the stock exchange(s) for the quarter ended June, 2020.	Fine of Rs. 2,000/-	<i>The listed entity had paid the fine imposed by NSE for the said default.</i>

(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 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Not Applicable	<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>	The listed entity asked the auditor to provide Peer Review Certificate.	Copy of Peer Review Certificate is still not provided.



2.	Not Applicable	<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 aforesaid report to its shareholders.</i>	No action required.	Not Applicable.
----	----------------	--	---------------------	-----------------

**For Munish K. Sharma & Associates
Company Secretaries**



Vijay Sharma

**CS Vijay Kumar Sharma
Partner**

M. No.: F9924

C.P. No. 12387

UDIN: F009924C000558483

Place: **Kaushambi, Ghaziabad**

Date: **30th June, 2021**