



# KILBURN ENGINEERING LTD.

PLOT NO. 6, MIDC-SARAVALI, KALYAN BHIWANDI ROAD, TALUKA BHIWANDI, DIST. THANE - 421 311, MAHARASHTRA, INDIA  
Tel : (Board No.) +91 2522 663800 / 283000 Fax : +91 2522 281026 / 280166 Email: info@kilburnengg.com Website : www.kilburnengg.com

30<sup>th</sup> June, 2021

To,  
Corporate Relationship Department  
BSE Limited  
P. J. Towers,  
Dalal Street, Fort  
Mumbai – 400 001  
Scrip Code: BSE 522101

To,  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range,  
Kolkata – 700 001  
Scrip Code: CSE 21022

Dear Sir/Madam

**Sub: Secretarial Compliance Report pursuant to regulation 24A of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations")**

Pursuant to provisions of regulation 24A of SEBI Listing Regulations, we submit Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021, attached herewith.

We request you to kindly take the same on records.

Thanking you.

Yours faithfully,

For Kilburn Engineering Limited

Arvind Bajoria  
Company Secretary



**SECRETARIAL COMPLIANCE REPORT OF**  
**KILBURN ENGINEERING LTD**  
(For the year ended 31<sup>st</sup> March, 2021)

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**Ref No: 227/2021-22**

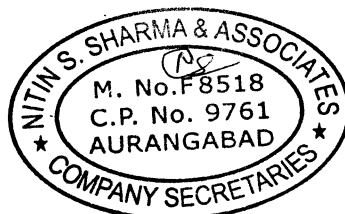
To,  
The Board of Directors,  
**Kilburn Engineering Ltd.,**  
4, Mangoe Lane,  
Kolkata, WB - 700001.

I, **Nitin Sharma** have examined:

- (a) all the documents and records made available to us except few documents which are submitted with the Calcutta Stock Exchange (CSE) and explanation provided by **Kilburn Engineering Ltd** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other documents/ filings, which has been relevant and relied upon to issue this certificate,
- (e) Representation Letter Issued by the Management,

for the year ended 31<sup>st</sup> 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"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");



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E-MAIL: nitinsharma00@gmail.com, Mobile: 9860954663

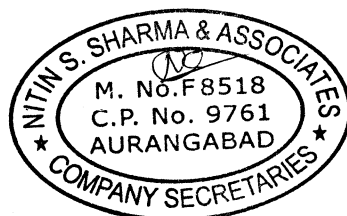
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The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (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 (Buyback of Securities) Regulations, 2018:  
***Not applicable to the company during the review period.***
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:***Not applicable to the company during the review period.***
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:***Not Applicable to the Company under review period***
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013:***Not applicable to the company 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 based on the above examination and , I hereby report that, during the review period:

- (a) The listed entity has *generally* complied with the provisions of the above Regulations and circulars/ guidelines issued except in respect of matters specified below:

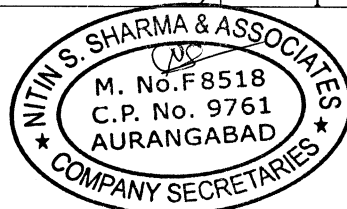


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Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Filing of financial results in XBRL mode as per SEBI Circular no. DCS/COMP/28/2016-17 dated March 30, 2017	Not submitted within the timeline	The Company has submitted the financial results in XBRL mode for the quarter ended March 31, 2020 with the delay of 9 days.
2.	Regulation 23 (9) of SEBI (LODR) Regulation, 2015	Not submitted within the timeline	The Company has submitted the Related Party Transactions Statement for the year ended 31 <sup>st</sup> March, 2020 with the Stock Exchanges on 08 <sup>th</sup> September, 2020.

- (b) The listed entity has maintained records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) No action has been taken against the listed entity/ its promoters/ directors 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
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2020	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity.
1.	The Company has	31 <sup>st</sup> March,	The provisions in	There has been no



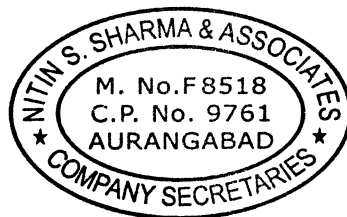
**NITIN S. SHARMA & ASSOCIATES**  
**COMPANY SECRETARIES**

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	submitted the Related Party Transactions Statement for the year ended 31 <sup>st</sup> March, 2019 with the Stock Exchanges on 04 <sup>th</sup> December, 2019.	2020	LODR were amended in 2019-20 w.r.t. these compliances, and the company has put in place appropriate monitoring mechanism to ensure that such compliances are completed timely	change in the position since previous year.
2.	The Company has submitted the annual report for the financial year 2018-19 with the delay of 11 days. However, the BSE vide its email dated 07 <sup>th</sup> January, 2020 has waived off the penalty for the aforesaid delay.	31 <sup>st</sup> March, 2020	The provisions in LODR were amended in 2019-20 w.r.t. these compliances, and the company has put in place appropriate monitoring mechanism to ensure that such compliances are completed timely	We have been informed by the Company that SEBI vide its email dated 07 <sup>th</sup> January, 2020 has waived off the penalty for the aforesaid delay.

I, further, report that in terms of SEBI circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019 in respect of appointment/ re- appointment/ resignation of statutory auditor from listed entities and their material subsidiaries, the listed entity has suitably modified the terms of appointment of the existing statutory auditor to give effect to clause 6(A) and 6(B) of the Circular. In this regard, I report that the company has complied with Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

Place: Mumbai  
Date: 29<sup>th</sup> June, 2021



For Nitin S. Sharma & Associates  
UDIN: F008518C000543019

*Nitin*

**Nitin Sharma**  
Practising Company Secretary  
CP 8518; FCS 9761