



KILBURN ENGINEERING LTD.

Plot No.6, MIDC - Saravali, Kalyan Bhiwandi Road, Distt. Thane 421 311 Maharashtra, India
☎ : +91 2522 283000 ☎ : +91 2522 281026 🌐 : www.kilburnengg.com

30th May, 2022

To,
Corporate Relationship Department
BSE Limited
1st Floor, 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

Sub.: Secretarial Compliance Report pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

Dear Sir/Madam,

We submit herewith Secretarial Compliance Report pursuant to regulation 24A of Listing Regulations for the year ended 31st March, 2022 issued by M/s. Nitin S. Sharma & Associates, Company Secretaries.

You are requested to take the same on record.

Yours Truly
For Kilburn Engineering Limited

Arvind Bajoria
Company Secretary

Encl : as above

SECRETARIAL COMPLIANCE REPORT OF
KILBURN ENGINEERING LTD
(For the year ended 31st March, 2022)

Ref No: 238/2022-23

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 31st March, 2022 ("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");



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 and 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.**
- (f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; - **Not Applicable to the Company during the review period.**
- (g) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008, The Securities and Exchange Board of India (Issue and Listing of Non - Convertible Redeemable Preference Shares) Regulations, 2013 and The Securities and Exchange Board of India (Issue and Listing of Non - Convertible Securities) Regulations, 2021; - **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 circulars / guidelines issued thereunder; and based on the above examination and considering the relaxations granted by the Securities and Exchange Board of India

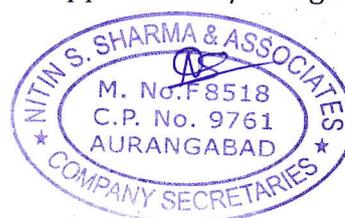


warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the review period:

- (a) The listed entity has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder.
- (b) The listed entity has maintained proper records under the provisions of the above regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- (c) During the review period no actions were taken against the listed entity/ its promoters/directors either by SEBI or by Stock Exchange (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (d) Following observations were made in previous Annual Secretarial Compliance Reports.

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2021	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity.
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	Listed Company ensures to take care in future.	Nil
2.	Regulation 23 (9) of SEBI (LODR) Regulation, 2015	Not submitted within the timeline	Listed Company ensures to take care in future.	Nil

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: 30/05/2022



For Nitin S. Sharma & Associates
UDIN: F008518D000436431

Nitin Sharma
Practising Company Secretary
CP 8518; FCS 9761