

KRA LEASING LIMITED

CIN: L65993DL1990PLC039637; Ph. No: 0124-4746817

E-mail: krleasing1990@gmail.com; Website: www.krleasing.com

Regd. Off: C-20, SMA Co-operative Industrial Estate, G.T. Karnal Road, Delhi-110033

Corp. Off: Plot No.3, Sector-11, IMT Manesar, Gurugram-122050, Haryana

To,
Department of Corporate Services- Compliances
Metropolitan Stock Exchange of India Ltd
Building A, Unit 205A, 2nd Floor,
Piramal Agastya Corporate Park,
L.B.S Road, Kurla West, Mumbai-400 070

Sub: Submission of Secretarial Compliance Report for the year ended 31st March 2021

Dear Sir,

This is with reference to above captioned subject; please find enclosed Secretarial Compliance Report for the year ended 31st March 2021 pursuant to regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

You are requested to take the same on your record.

Thanking you,

For KRA Leasing Limited



Ridhima Gupta
Compliance Officer and Company Secretary

Date: 29.06.2021

Tele. : +91 11 6454 1222
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Mobile : +91 9999318222



Secretarial compliance report of KRA Leasing Limited, for the year ended 31st March 2021

I Debasis Dixit, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **KRA Leasing 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 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"), 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
- (e) *Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) *Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) *Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depository and Participants) Regulation, 2018 and circulars/guidelines issued thereunder;

D DIXIT & ASSOCIATES
COMPANY SECRETARIES

Regd. Office : H-2/206, Apra North Ex Plaza, Netaji Subhash Place, New Delhi-110034



***No Event took place in the company during the period under Scrutiny**

and based on the above examination, 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, except in respect of matters specified below:-

Sr .N O	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	As per Regulation 23(9) of SEBI (Listing Obligations & Disclosures Requirements) Regulation, 2015, the listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website	Delay in submission of Related Party Transactions for the quarter ended 30 th September 2020	Company has submitted details of Related Party Transactions for the quarter ended 30 th September 2020 on 20 th January 2021.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my 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	Metropolitan Stock Exchange India Limited	Non-compliance of Reg. 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for half year ended September 30, 2020	The Stock Exchange has imposed penalty of INR 206500/- inclusive of GST vide their notice dated 18 th January 2021 which was subsequently increase to INR 218300/- vide their email dated 29 th January 2021.	The Stock Exchange has imposed fine/penalty of INR 218300/- on the Company towards Non-compliance of Reg. 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for half year ended September 30, 2020. The Company vide email dated 02 nd February 2021 made submission and requested the Stock Exchange to waive off the aforesaid fine/penalty and Stock Exchange vide their email dated 19 th April, 2021 has confirmed

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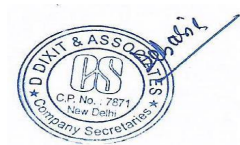


				that Internal Committee for handling waiver requests has accepted such waiver request and such fine has been waived off by the Stock Exchange.
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sl No.	Observation of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March 2020 (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

**For D Dixit & Associates
Company Secretaries**



CS Debasis Dixit

Prop.

FCS-7218, CP-7871

Date:- 29th June 2021

UDIN-F007218C000540036

**D DIXIT & ASSOCIATES
COMPANY SECRETARIES**

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