

**SECRETARIAL COMPLIANCE REPORT OF AVT NATURAL PRODUCTS
LIMITED FOR THE YEAR ENDED 31.03.2021**

We, V Suresh Associates, Practising Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. AVT Natural Products Limited**("the listed entity").
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, - Last Quarter filings with Stock exchange not updated in Website
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31.03.2021, 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;(no events during the audit 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; (no events during the audit period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;(no events during the audit period)



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (no events during the audit period)

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (no events during the audit period)

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

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.No	Compliance Requirement (Regulations/ Circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
NIL	NIL	NIL	NIL

(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 Practising Company Secretary, if any.
1	BSE & NSE	Non- Compliance with the provision relating to constitution of Audit Committee under Regulation 18(1) of SEBI (Listing Obligations and Disclosures Regulations) Requirements, 2015 for the quarter ended 31.03.2020.	BSE & NSE imposed a fine of Rs.99,120/- each on 2 nd July 2020 (Including GST) for the Quarter ended 31 st March 2020, which pertains to the previous financial year.	The Company has paid the necessary fines to both the Stock Exchanges on 7 th July 2020.

(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..	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity.
1.	The BSE & NSE imposed a fine of Rs.1,27,440/- each (including GST) for Non-Compliance with the provisions relating to constitution of Audit Committee under Regulation 18(1) of SEBI (Listing Obligations and Disclosures Regulations) Requirements, 2015 for the quarter ended 31.12.2021. The Company has paid the fine to both the Stock Exchanges on 07.07.2020.	31.03.2020	The Board reconstituted the Audit committee on 12.02.2020 to include 6 directors, 4 being independent directors, which is 2/3 of the members.	Action taken as mentioned by the Company.



(e) The Listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMDU/14/2019 dated October 18, 2019, in terms of Para 6(4) and 6(8) of the said circular and has suitably modified the terms of appointment of its Statutory Auditor.

Place: Chennai
Date: 24.06.2021

For V Suresh Associates
Practising Company Secretaries



V Suresh
Senior Partner
FCS No. 2969
C.P.No. 6032
Peer Review Cert. No.: 667/2020
UDIN: F002969C000502743