

# Krebs Biochemicals & Industries Limited

CIN : L24110AP1991PLC103912



30<sup>th</sup> May 2022

To,  
The Manager,  
Listing Department,  
National Stock Exchange of India Limited,  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (E), Mumbai- 400051.

The Manager,  
Department of Corporate Relations,  
BSE Limited,  
P J Towers, Dalal Street,  
Fort, Mumbai- 400001.

Dear Sir/Madam,

**Sub: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2022.**

**Ref: Reg. 24A of SEBI (LODR) Regulations, 2015**

We refer to the above captioned subject, we herewith submit to you Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2022 as required under Reg. 24A of SEBI (LODR) Regulations, 2015 and SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 29, 2019, issued by M/s D S M R and Associates, Practicing Company Secretaries, Hyderabad dated 30<sup>th</sup> May 2022.

Kindly take the same into your records.

Thanking You,

Yours Faithfully

For **Krebs Biochemicals and Industries Limited**

  
  
Taruni Banda

**Company Secretary and Compliance Officer**

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Regd. Office : Kothapalli (V), Kasimkota (M), Anakapalli, Visakhapatnam, Andhra Pradesh-531 031 Corporate Office :  
8-2-577/B, Plot No. 34, 3rd Floor, Maas Heights, Road No. 8, Banjara Hills, Hyderabad-500 034  
Tel : 040-66808040 E-mail- [marketing@krebsbiochem.com](mailto:marketing@krebsbiochem.com) Website- [www.krebsbiochem.com](http://www.krebsbiochem.com)

Secretarial compliance report of **KREBS BIOCHEMICALS AND INDUSTRIES LIMITED**  
for the year ended 31<sup>st</sup> March, 2022

[Pursuant to the SEBI Circular No. IR/CFD/CMD/27/2021/ Dated 08.02.2021]

We have examined:

- a) all the documents and records made available to us and explanation provided by KREBS BIOCHEMICALS AND INDUSTRIES LIMITED ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document/ filing, as may be relevant,

which has been relied upon to make this certification, for the year ended 31<sup>st</sup> 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")
- c) The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-
- I. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; except as mentioned in point no. XI (a)

The reporting of Clause 6A and 6B of the Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of Statutory Auditors from the listed entities and their material subsidiaries" is not applicable during the Review period.

- II. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

Pursuant to the exercise of further conversion option by IPCA Laboratories Ltd. and upon receipt of the balance application money, the Board of directors of the Company at their meeting held on 6<sup>th</sup> April, 2021 have converted 19,40,000 warrants and allotted 19,40,000 (Nineteen Lakhs Forty Thousand) Equity shares of Rs.10/- each of the Company at a price of Rs. 86/- per Equity Share, including premium of Rs. 76/- per share to M/s IPCA Laboratories Limited, the entity forming part of the promoter group.

For **DSMR & ASSOCIATES**  
**COMPANY SECRETARIES**

Page 1 of 4

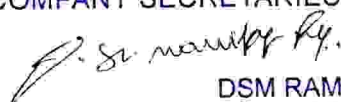
*S. Sr. Manik R.*  
**DSM RAM**

The Equity shares allotted upon conversion of warrants issued shall rank pari passu with the existing equity shares of the Company in all respects

- III. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- IV. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;  
During the period of our audit the Company has not done any buy back of its securities. Hence the reporting of compliance under these regulations does not arise;
- V. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;  
During the period of our audit the Company has not issued any securities under these regulations and also does not have an ESOP plan. Hence the reporting of compliance under these regulations does not arise.
- VI. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;  
During the period of our audit the Company has not issued any Debt Securities under these regulations. Hence the reporting of compliance under these regulations does not arise.
- VII. Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013;  
During the period of our audit the Company has not issued any Preference Shares during the reporting period. Hence, the reporting of compliance under these regulations does not arise.
- VIII. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- IX. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;  
During the period of our audit the Company has not delisted its Equity Shares from any of the exchanges, where the shares are listed. Hence the reporting of compliance under these regulations does not arise; and
- X. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- XI. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except the following:

For DSMR & ASSOCIATES  
COMPANY SECRETARIES



DSM RAM  
PROPRIETOR  
C.P.No. 4239

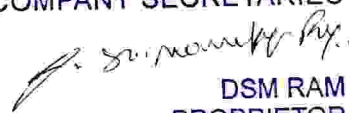


Sl. No.	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015	Entire shareholding of the promoters not in Demat form	As we observe from the records of the Company 20,400 Equity shares belonging to the promoters are under dispute in the court of law.
2.	Regulation 47 of SEBI (LODR) Regulations, 2015	Publication of Financial Results	The company has not published its Audited financial results in the newspapers for the Quarter and year ending 31 <sup>st</sup> March 2021
3.	SEBI (Prohibition of Insider Trading) Regulations, 2015	Intimation regarding the Closure of Trading window	There was delay in Intimating the Closure of Trading window for the Quarter ending 30 <sup>th</sup> June 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 our examination of those records.
- (c) The following are the details of action 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

Sl. 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
	NIL	NIL	NIL	NIL

For DSMR & ASSOCIATES  
COMPANY SECRETARIES



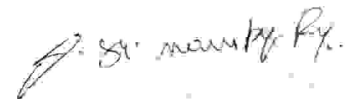
DSM RAM  
PROPRIETOR  
C.P.No 4239

(d) The listed entity has taken the following actions to comply with the observations made in the previous report.

Sl No.	Observations of the Practicing Company Secretary in the Previous reports	Observations made in the secretarial compliance report for the year ended	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 31 (2) of SEBI (LODR) Regulations, 2015 – Entire Promoter Share holding is not in Demat form.	31 <sup>st</sup> March, 2021	Since the shares are subject matter of a case in the Hon'ble High court the promoters are putting in their best efforts to get the case disposed.	We observe that 20,400 Equity shares belonging to the promoter group are under dispute in the court of law.

Place: Hyderabad  
Date: 30<sup>th</sup> May, 2022

For DSMR & Associates  
Company Secretaries



D S M Ram  
C. P. No. 4239  
Proprietor

UDIN: A014939D000425866

Peer Review Certificate No. 1252/2021 dated 15<sup>th</sup> May, 2021