

3rd March, 2022

To,
BSE limited
Dept. DSC_CRD
Phiroze Jeejeebhoy Towers,
Dalal street
Mumbai - 400 001
Scrip Code: 524444

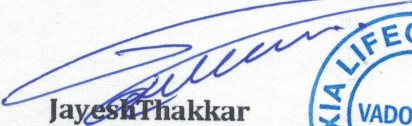
Sub.: Annual Secretarial Compliance Report for the year ended on 31st March, 2021

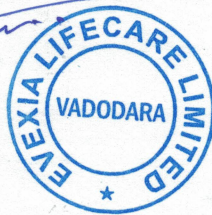
Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, as amended, please find enclosed herewith Annual Secretarial Compliance Report for the year ended on 31st March, 2021, issued by M/S Devesh Pathak & Associates, Practising Company Secretaries, Vadodara.

You are requested to kindly take the same on your records.

Yours Faithfully
For EvexiaLifecare Ltd.
[formerly: KavIt Industries Limited]


Jayesh Thakkar
Managing Director
DIN: 01631093





CS Devesh A. Pathak
B.Com., LL.B., F.C.S.

DEVESH PATHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

REGD. INSOLVENCY PROFESSIONAL

REGD. TRADE MARKS AGENT

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FIRST FLOOR, 51, UDYOGNAGAR SOCIETY,
NEAR AYURVEDIC COLLEGE, OUTSIDE PANIGATE,
VADODARA-390 019

Secretarial Compliance Report of Evexia Lifecare Limited for the year ended 31st March, 2021

To,
Evexia Lifecare Limited
VILL: TUNDAO, TAL: SAVLI
Vadodara GJ 391775 IN

We, M/s. Devesh Pathak & Associates have examined:

- all the documents and records made available to us electronically only in view of COVID-19 Advisories and explanation provided by Evexia Lifecare Limited (*formerly: Kavita Industries Limited*) ("the listed entity"),
- the filings/submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/filing, as may be relevant, which has been relied upon to make this certification

for the year ended 31st March, 2021 in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018





and based on the above examination, We hereby report that, during the Review Period:

- (1) The Company has not issued any securities and accordingly
- The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018,
 - The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014,
 - The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008,
 - Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013.

were not applicable.

- (2) The Company has neither got delisted Equity Shares nor bought back any security of the Company and accordingly
- The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and
 - The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018

were not applicable.

- (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 Practicing Company Secretary
1.	Intimation of Closure of Trading Window. [Applicable provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 (including code of conduct)]	Delayed intimation of closure of trading window (Period of delay: 58 days)	Closure of trading window intimated to BSE on 28 th May, 2020 with delay
2.	Submission of Compliance Report on Corporate Governance for the quarter ended 31 st March, 2020. [Regulation 27(2)(a) of LODR]	Delayed submission (Period of delay: 8 days)	Submission to BSE on 23 rd May, 2020 with delay.
3.	Submission of Statement of Investor Complaints for the quarter ended 31 st March, 2020. [Regulation 13(3) of LODR]	Delayed submission (Period of delay: 4 days)	Submission to BSE on 19 th May, 2020 with delay
4.	Submission of Shareholding Pattern for the quarter ended 31 st March, 2020 [Regulation 31 of LODR]	Delayed submission (Period of delay: 5 days)	Submission to BSE on 20 th May, 2020 with delay
5.	Submission of Reconciliation of Share Capital Audit Report for the quarter ended 31 st March, 2020 [Regulation 76 of DP Regulations]	Delayed submission (Period of delay: 2 days)	Submission to BSE on 02 nd June, 2020 with delay
6.	Submission of Annual Secretarial Compliance Report for the year ended 31 st March, 2020	Delayed submission (Period of delay: 52 days)	Submission to BSE on 21 st September, 2020 with delay





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Continuation Sheet....

	[Regulation 24A of LODR]		
7.	Hundred percent of Shareholding of promoter(s) or promoter group to be in dematerialized form and the same is to be maintained on a continuous basis [Regulation 31(2) of LODR]	Out of 2,66,45,783 Equity shares held by the promoter(s)/ promoter group, 7,432 shares are still in physical form.	7,432 number of shares held by promoter(s)/promoter group are still in physical form.
8.	Website disclosures [Regulation 46 of LODR]	Not uploaded disclosures as per the requirement of regulations.	The Company is in process of updation.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far as it appears from our 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 Ltd.	Non-submission of the statement on shareholder complaints within the period prescribed under Regulation 13(3) of LODR in respect of redressal of investor grievances for the quarter ended 31 st March, 2020.	Notice for fine of Rs. 2,360 videemail dtd. 03.06.2020	Payment of fine of Rs. 2,360 is yet to be made.
2.	BSE Ltd.	Failure to ensure that adequate steps are taken for expeditious redressal of investor complaints pursuant to Regulation 13(1) of LODR.	Notice for fine of Rs. 18,880 videemail dtd. 16.12.2020	Payment of fine of Rs. 18,880 is yet to be made.

(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 report	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.	i. Delayed appointment of Compliance officer [Regulation 6(1) of	-	The Company appointed CS Mr. Harish Punwani as	It was informed to us that as on the date of the report





	<p>LODR]</p> <ul style="list-style-type: none">- Period of delay: 90 days as at 31st March, 2019- Period of Delay: 74 days as at 30th June, 2019 <p>ii. Fine of Rs. 1,06,200 by BSE Ltd. Vide its letter dtd. 14.05.2019 till the quarter ended 31st March, 2019 which is yet to be paid.</p> <p>iii. Fine of Rs. 87,320 till the date of compliance for the quarter ended 30th June, 2019 by BSE Ltd. vide its letter dtd. 14.08.2019 which is yet to be paid.</p>		Compliance Officer w.e.f 14.06.2019	the fines have been paid off.
2.	<p>Submission of Statement of Investor Complaints for the quarter ended 31st March, 2019</p> <p>Delayed submission (Period of delay: 12 days)</p>	-	Submission to BSE on 3 rd May, 2019 with delay	Submitted with a delay.
3.	<p>Delayed submission of :</p> <p>i. Compliance Report on Corporate Governance for the quarter ended 31st March, 2019 [Period of delay: 118 days] [Regulation 27(2)(a) of LODR]</p> <p>ii. Compliance Report on Corporate Governance for the quarter ended 30th June, 2019 [Period of delay: 109 days] [Regulation 27(2)(a) of LODR]</p> <p>iii. Compliance Report on Corporate Governance for the quarter ended</p>	-	<p>i. Submission to BSE on 12th August, 2019 with delay.</p> <p>ii. Submission on 2nd November, 2019 with delay.</p> <p>iii. Submission on 23rd January, 2020 with delay.</p>	Submitted with a delay.





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Continuation Sheet.....

	31 st December, 2019 [Regulation 27(2)(a) of LODR]			
4.	Hundred percent of Shareholding of promoter(s) or promoter group to be in dematerialized form and the same is to be maintained on a continuous basis. Out of 2,66,45,783 Equity shares held by the promoter(s)/ promoter group, 7,432 shares are still in physical form.	-	Action in the regard is pending.	7,432 number of shares held by promoter(s)/ promoter group are still in physical form.
5.	Delayed submission of Annual Secretarial Compliance Report for the year ended 31 st March, 2019 (Period of delay: 57 days)	-	Submission to BSE on 27 th July, 2020 with delay.	Submitted with a delay.

Place: Wood Ridge
Date: 7th December, 2021



For Devesh Pathak & Associates

CS DSevesh A. Pathak

FCS No.: 4559

CP No.: 2306

UDIN: F004559C001681080