

June 13, 2023

To, BSE Ltd.
P.]. Towers
Dalal Street,
Mumbai - 400 001

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023.

BSE Code: 524444

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019, dated February 8, 2019, we enclose herewith the Annual Secretarial Compliance Report issued by Mr. Brajesh Gupta, Practicing Company Secretary, proprietor of M/s. Brajesh Gupta & Co. for the year ended March 31, 2023.

You are requested to take the same on your record.

Thanking you,

Yours faithfully,

## For, EVEXIA LIFECARE LIMITED

Jayeshkumar Raichandbhai Thakkar

Digitally signed by JAYESHKUMAR RAICHANDBHAI THAKKAR Date: 2023.06.13 12:18:04 +05'30'

JAYESH RAICHANDBHAI THAKKAR MANAGING DIRECTOR (DIN: 01631093)



## BRAJESH GUPTA & Co.

COMPANY SECRETARY IN PRACTICE ICSI UCN- SS2020752900, PRN-2012/2022 Add: I-74, LIG COLONY, INDORE (M.P.)-452007

Ph. No. +917566666512, email-id: brajesh.cs19@gmail.com

## SECRETARIAL COMPLIANCE REPORT OF EVEXIA LIFECARE LIMITED FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2023

I, Brajesh Gupta, proprietor of M/s Brajesh Gupta & Co., Company Secretaries have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Evexia Lifecare Limited (CIN:-L23100GJ1990PLC014692) (hereinafter referred as 'the listed entity'), having its Registered Office at Tundav Anjesar Road, Village Tundav, Savli, Vadodara, Gujarat, 391775. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on **March 31, 2023** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter

- I, Brajesh Gupta, proprietor of M/s Brajesh Gupta & Co., Company Secretaries have examined:
  - a) all the documents and records made available to me and explanation provided by **Evexia Lifecare 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 report,

for the year ended on **March 31, 2023** ("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 during the review period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Swear Equity) Regulations, 2021; (Not Applicable during the review period) M.No.33070
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities)

- Regulations, 2021; (Not Applicable during the review period)
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018; and circulars/guidelines issued thereunder; and based on the above examination,

I hereby report that, during the Review Period:

I. (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:

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results. It is further be noted that thereafter the received another mail 30th Мау 2022 from BSE for filing of disclosure of related party transaction s (Reg. 23(9) SEBI (LODR) Regulations 2015 wherein it was mentioned that the due date for such filing is 15 days from the date of publication of financial results. Further, the Board meeting to consider and approve the Audited Financial Results for the Quarter and Year ended 31st March, 2022 was held on 12th April, 2022 and

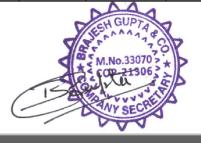
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(b) The listed entity has taken the following actions to comply with the observations made in **previous** reports:

Sr.		_	Deviatio				Fine		Man- age-	Re-
L	pliance	lation/	ns	Taken	l	of	Amount	vations/	ment Re-	marks
No.	Require-	Circula		by	Action	Violatio		Remarks	sponse	
	ment	r No.				n		of the		
	(Regu-							Practicing		
	lations/				Advisory			Company		
	circulars/				/			Secretary	<i>&gt;</i>	
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	lines				ion/			OY		
	including				1 1		<i>-</i>			
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	clause)				w Cause		(A)			
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	Williaow.	ı			All.			ended 31st		
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			days)	)-				to BSE on		
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2	Submission	Securiti	i. Delaved	BSE	Fine	Non	Rs.	The	The	The
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	s	of India				Related		1 *	has	Impose
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		ions,	Delay:21						n would	
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			Related						report.	
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		1	days)							
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3	Submission	Securiti	Delayed	-	-	-	-	Submissio	The	-
l	of Annual	es and	submissi						Company	
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l	Report for	Board	(Period of					2022 with	Annual	
l	the year	of India	delay:					Delay	Secretaria	
	ended 315	(Listing	246 days)						1	
	March,	Obligati							Complian	
	2021	ons							ce Report	
	[Regulation	and					~	221	on 03rd	
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	LODR]	ure					A ST.	1728	2022.	
	_	Require					A TEM.	No.33070 3 *		
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	demateriali	ons	s)/					physical	the	subdivi
	zed form	1	promoter						promoter'	sion
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II		Meeting [Regulation	Board							that the	
Ш		Regulation	of India	days)						mistake	
II		34 of	Krisenie						December,		
Ш		LODR]	Obligati						2021 has	I .	
II			ons							nt in	
Ш			and						submitted	- 4	
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Ш										n 2015.	
ı										11 2015.	
Ш	6	Website	Securiti	Non-	-	- 1	-	-	Website	The	-
II		disclosures	es and	maintena			( ×		and its	managem	
II			Exchan	nce of			,		disclosure	ent	
II		[Regulation	ge	website.					are not	clarified	
II		46 of	Board						accessible.	that they	
Ш		LODR]	of India							have	
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7	Appointme	Securiti	Delayed	-	-	-	-	The	-	-
	nt of	es and	Appointm					Company		
	Company	Exchan	ent of					has		
	Secretary	ge	Company					appointed		
	as	Board	Secretary					M. Anmol		
	Compliance	of India	as					Shanwlesh		
	Officer	(Listing	Complian					a,		
	[Regulation	Obligati	ce Officer					Company		
	6 of LODR]	ons	(Period of					Secretary		
		and	delay:					as	4	
		Disclos	303 days)					Complianc	4	
		ure						e officer of	$\langle O \rangle$	
		Require						the		
		ments)						Company		
		Regulat						0 100	<i>y</i>	
		ions,						On 10 <sup>th</sup>		
		2015						January,		
								2022 with		
								a delay.		

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

		*	
Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions what an auditor	hile appointing/	re-appointing
Q.R.	<ul> <li>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</li> <li>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</li> <li>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</li> </ul>	N.A.	SM.No.33070
2.	Other conditions relating to resignation of st	atutory auditor	COP 21306

	i.	Reporting of concerns by Auditor with	N.A.	-
		respect to the listed entity/its material		
		subsidiary to the Audit Committee:		
	a.	In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit	N.A.	
		Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		- ART
	b.	In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents	<b>—</b>	, <u>, , , , , , , , , , , , , , , , , , </u>
		has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of		,
		information / explanation from the company, the auditor has informed the Audit	~~	
		Committee the details of information / explanation sought and not provided by the management, as applicable.	~	
	c.	The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	N.A.	
		Ċ		
	ii. inf	Disclaimer in case of non-receipt of formation:	N.A.	
		e auditor has provided an appropriate sclaimer in its audit report, which is in cordance with the Standards of Auditing as		
0	en <sup>-</sup>	ecified by ICAI / NFRA, in case where the listed tity/ its material subsidiary has not provided formation as required by the auditor.		
3.	ፐኤ	e listed entity / its material subsidiary has	N.A.	The Company
3.	ob res	tained information from the Auditor upon signation, in the format as specified in mexure- A in SEBI Circular CIR/		has Three subsidiaries i.e. Kavit Edible Oil
	CF	D/CMD1/114/2019 dated 18th October, 19.	222	Limited, Kavit Trading Private
		· · ·	M.No.33070 2	Limited, Evexia Lifecare Africa Limited and one
			Qui 1306	stepdown
			WY SECRE	

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	A	frica	Limited,
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III. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr.	Particulars Particulars	Compliance	Observations
No.		Status	/Remarks by
		(Yes/No/	PCS*
		NA)	
1.	Secretarial Standards:		- (2_)Y
	The compliances of the listed entity are in	Yes	
	The compliances of the listed entity are in		
	accordance with the applicable Secretarial		• >
	Standards (SS) issued by the Institute of	5	Y I
	Company Secretaries of India (ICSI).	1	
2.	Adoption and timely updation of the		-
	Policies:		
	• All applicable policies under SEBI	* 7	
	Regulations are adopted with the	1	
	approval of board of directors of the listed entities		
	<ul><li>All the policies are in conformity with</li></ul>		
	SEBI Regulations and have been		
	reviewed & updated on time, as per the		
	regulations/circulars/guidelines	Yes	
	issued by SEBI		
3.	Maintenance and disclosures on		
	Website:		
	The Listed setity is maintaining of		
	• The Listed entity is maintaining a functional website	Yes	
	• Timely dissemination of the		
1	documents/ information under a	l No	
	separate section on the website		
	Web-links provided in annual		The Website of the Company is
K) >	corporate governance reports under	l Vec	not updated as stipulated in
	Regulation 27(2) are accurate and	-	Regulation 46(2) of the SEBI
	specific which re- directs to the		(LODR) Regulations, 2015
	relevant document(s)/ section of the		
4.	website  Disqualification of Director:		_
f	Disquantication of Director.		- 0.00
	None of the Director(s) of the Company is/	Yes	Ju GUPT
	are disqualified under Section 164 of		JSE - 1 1 1 4 1 4 1 1 1 1 1 1 1 1 1 1 1 1 1
	Companies Act, 2013 as confirmed by the		X 33070 3
	listed entity.		\$ COP 21306 \$ *
<u> </u>			
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5.	Details related to Subsidiaries of listed		
٥.			·
	entities have been examined w.r.t.:		
	(a) Identification of material subsidiary	3.7	
	companies	Yes	
	(b) Disclosure requirement of material		
	as well as other subsidiaries		
	D 4: CD 4		
6.	Preservation of Documents:		·
	The listed entity is preserving and		
	maintaining records as prescribed under	V	λ <sup>1</sup>
	SEBI Regulations and disposal of records		
	as per Policy of Preservation of Documents		
	and Archival policy prescribed under SEBI		
	LODR Regulations, 2015.		X Y Y
L_			
7.	Performance Evaluation:		(%)
			XXY
	The listed entity has conducted		
	performance evaluation of the Board,		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
	Independent Directors and the Committees	Yes	
			/
	at the start of every financial year/during		
	the financial year as prescribed in SEBI	17	
	Regulations.		
	3		
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior		
	approval of Audit Committee for all		
	related party transactions; or	Yes	
	(b) The listed entity has provided		
	detailed reasons along with		
	confirmation whether the		
	transactions were subsequently		
	approved /ratified/rejected by the		
	Audit Committee, in case no prior		
	approval has been obtained.		
9.	Disclosure of events or information:		The Company has failed to
			make disclosure under
	The listed entity has provided all the		Regulation 30 read with sub
	required disclosure(s) under Regulation 30		•
	along with Schedule III of SEBI LODR	NI_	clause (2.1) (f) under Para 2
1	Regulations, 2015 within the time limits		SEBI Circular No.
			CIR/CFD/CMD/4/2015 dated
1	prescribed thereunder.		September 15, 2015 for
$\{O\}$			issuance of Foreign Currency
			Convertible Bonds
			(FCCBs)/GDR/QIP/other
			secu <del>ri</del> ties linked to equity/
			any instruments or securities
			representing convertible
	NAAA		securities within 24 hours
	ESH GUPTA		from the board meeting held
	Q 2 - 1 1 2 C		r – III
	M.No.330707		on 07/11/2022 i.e. date of
	(cop 21306)		occurrence of event or
	South		information. Further the
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10			Company has uploaded the disclosure on 14/11/2022 i.e. delay of 6 days.
10.	Prohibition of Insider Trading:  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The Company had maintained the data in Excel format and therefore was tamperable in nature and hence in violation of compliance of Structured Digital Database (SDD) in terms of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations).
11.	Actions taken by SEBI or Stock Exchange(s), if any:		Pursuant to SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2
Q.S.	No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	No	020/12 dated January 22, 2020 BSE has taken following actions:  1. Imposed a fine of Rs. 82,600/- to the Company for late submission of disclosure of related party transactions for period ended March, 2022 under Reg.23(9) of SEBI (LODR) Regulations, 2015. The Company has filed disclosure of related party transactions on May 11, 2022 which is delay of 14 days.  2. Imposed a fine of Rs. 68,440/- for late submission of shareholding Pattern under regulation 31(b) of SEBI (LODR), Regulations, 2015 for the quarter ended December 31, 2022. The Company has filed shareholding pattern of quarter ended December 31, 2022 on February 21, 2023
12.	Additional Non-compliances, if any:	No	which is delay of 31 days.  1. Mr. Anmol Shanwlesha has resigned from the post
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	M.No.33070 - + COD 21306 - + C	of Company Secretary and Compliance Officer of the Company w.e.f. December 29, 2022 thereafter as per Reg.6(1) of SEBI LODR, the Company is required to appoint a qualified

Company secretary as a Compliance Officer, however the Company failed to appoint a Company Secretary as Compliance Officer.  2. 100% (hundred percent) shareholding of promoter(s) and promoter group are not in dematerialized form as per Regulation 31(2) of SEBI
(LODR) Regulations, 2015

## Assumptions & Limitation of scope and Review:

- 1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- 2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- 3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- 4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity

For, Brajesh Gupta & Co. Practicing Company Secretary

Brajesh Gupta, Proprietor

Mem. No. ACS- 33070 C P No.: 21306

UDIN: A033070E000480396

Place: Indore Date: 12.06.2023