

NibeLimited

(formerly known as Kavita fabrics Limited)

105, Balaji Industrial Society-1,UdhanaMagdalla Road,Surat – 395 007Gujarat, India.

Tel:0253-2237599 Email:info@nibelimited.com

CIN No.: L34100GJ2005PLC046929

Date : 14.05.2021

To,
The General Manager
Listing Operation,
BSE Limited,
P.J.Towers,
Dalal Street,
Mumbai – 400 001
Scrip code 535136

**Sub. : Submission of Annual Secretarial Compliance Report as per Regulation 24 A of SEBI
(Listing Obligation and Disclosure Requirement) Regulations, 2015**

Pursuant to provisions of the Regulation 24 A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015, we hereby submit Annual Secretarial Compliance Report for the year ended 31.03.2021.

Kindly take the same on your record.

Thanking you,

Yours Faithfully,
For Nibe Limited
(formerly known as Kavita fabrics Limited)

Sd/-

Ganesh Ramesh Nibe
Managing Director
DIN No.: 02932622



GAUTAM TIWARI

Practicing Company Secretary
Plot No. 2, Nalode Layout, Gayatrinagar, Gopalnagar,
Nagpur, 440022-MH
Contact no. +91 9595246339
Email: csgautamtiwari@gmail.com

The Board of Directors

Nibe Limited (Formerly Known as Kavita Fabrics limited)

CIN: L34100GJ2005PLC046929

105, Balaji Industrial Society-1,
Udhna Magdalla Road,
Surat – 395 007Gujarat

I have been appointed by Nibe Limited (Formerly known as Kavita Fabrics Limited) (hereinafter referred to 'as the Company') whose equity shares are listed with BSE (Security code: 535136) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, as amended, read with SEBI's circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance of the provisions Securities and Exchange Board of India Act, 1992 ("SEBI Act"), the Securities Contracts (Regulation) Act, 1956("SCRA"), and all applicable Rules, Regulations and circulars /guidelines issued thereunder from time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with the provisions of all SEBI Act, SCRA and all applicable Rules, Regulations and circulars/guidelines issued thereunder from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in manner which involved such examinations and verifications as considered necessary and adequate for the said purpose, subject to the limitation that due to lockdown and social distancing guidelines issued by the Ministry of Home Affairs and State Government norms for containment of spread of Second Wave of Covid-19, the Company has provided the records via electronic means and no physical verification has been made by me. However, the management of Company has confirmed that all documents provided by electronic means are true and correct copies of original documents.

Annual Secretarial Compliance Report in the format prescribed is enclosed herewith.

For CS Gautam Tiwari

**gautam
tiwari**

Digitally signed by
gautam tiwari
Date: 2021.05.13
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Gautam Tiwari
Membership No. A33071
CoP No. 19158

Date: May 13, 2021
Place: Nagpur

UDIN: A033071C000295223



GAUTAM TIWARI

Practicing Company Secretary
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Secretarial Compliance Report of Nibe Limited for the Financial year ended 31st March, 2021

The Board of Directors

Nibe Limited (Formerly Known as Kavita Fabrics limited)

CIN: L34100GJ2005PLC046929

105, Balaji Industrial Society-1,
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I, Gautam Tiwari, Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Nibe 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; **(Not Applicable during the Review Period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not Applicable during the Review Period)**
- (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) Regulations, 2014; ; **(Not Applicable during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)



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Regulations, 2008;

(Not Applicable during the Review Period)

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the Review 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 Practicing Company Secretary
1.	Composition of Board and committees of the Board of the Company shall be in accordance with the provisions of regulations 17 to 20 the SEBI (LODR) Regulations, 2015	During the period from 01.04.2020 to 31.03.2021, composition of Board and committees of Board are in accordance with the regulation 17 to 20 of the SEBI (LODR) Regulations 2015	Now the composition of Board is in order for FY 2020-2021.

(b) The listed entity has maintained proper records under the provisions of the above



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Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records;

- (c) 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: None

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.				

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

Sr. No.	Observation of Practicing Company Secretary in previous Reports	Observation made in the secretarial compliance report for the year ended 31st March 2020	Action taken by listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
1.	Regulations 6 (1) Compliance officer is not a	NIL	Company is in process of shortlisting candidates. Previous	



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	qualified Company Secretary		company Secretary resigned on 07.01.2021 and company have time to appoint till 06.07.2021.	
2.	Regulation 7(3) Compliance certificate submitted to the exchange signed by person other than Compliance officer	Signed by the Managing Director as per the records made available to me.	Non availability of CS in office due to pandemic situation.	

For CS Gautam Tiwari

**gautam
tiwari** Digitally signed by
gautam tiwari
Date: 2021.05.13
18:30:56 +05'30'

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