

To,  
**Navneet Education Limited**  
Navneet Bhavan, Near Shardasharan Society,  
Bhavani Shanker Road, Dadar(W), Mumbai 400028

**Secretarial Compliance Report of Navneet Education Limited**  
**(CIN: L22200MH1984PLC034055) for the year ended March 31, 2021**

I, Sunil M. Dedhia, have examined:

- (a) all the documents and records made available to us and explanation provided by **Navneet Education 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 which were not applicable during the Review 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 which were not applicable during the Review Period;

*Sunil Dedhia*



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 which were not applicable during the Review Period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 which were not applicable during the Review Period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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	Delay in processing of dematerialization request vide Regulation 76(2) of SEBI (Depositories and Participants) Regulations, 2018	Processing delay of two demat request for aggregate 4375 shares received during quarter ended 30.09.2020 and two demat request for aggregate 9375 shares received during quarter ended 31.12.2020 were delayed beyond 21 days reported in the PCS Reports on Reconciliation of Share Capital submitted to the Stock Exchanges for respective quarters.	These delays are covered under relaxations granted vide SEBI Circular No. SEBI/HO/MIRSD/RTA MB/P/CIR/2021/558 dated April 29, 2021 read with SEBI Circular No. SEBI/HO/MIRSD/RTA MB/CIR/P/2020/59 dated April 13, 2020

*Sunil Dedhia*



- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/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 Practicing Company Secretary, if any.
Not applicable				

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

Sr. No.	Observations of the Practicing 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 Practicing Company Secretary on the actions taken by the listed entity
Not applicable				



Place: Mumbai  
Date: June 29, 2021

*Sunil Dedhia*  
CS Sunil M. Dedhia  
Proprietor, Sunil M. Dedhia & Co.  
Company Secretaries  
FCS No: 3483 C.P. No. 2031  
Peer Review Certificate No. 867/2020  
UDIN: F003483C000539139