



To,

Date: 27.07.2020

BSE Limited  
P J Towers, Dalal Street,  
Mumbai-400001

Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2020 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018**

**Ref: Variman Global Enterprises Limited (Scrip Code: 540570)**

With reference to the subject cited, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2020 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018.

This is for the kind information and records of the Exchange, please.

Thanking you.

Yours sincerely,  
For Variman Global Enterprises Limited



D. Sirish  
Managing Director  
DIN: 01999844

**VARIMAN GLOBAL ENTERPRISES LIMITED**

(Formerly known as Spring Fields Infraventures Limited)

#1-2-217/10, Street No.10, Gagan Mahal, Hyderabad-500029. Ph : +91-98497 26198

info@varimanglobal.com | Web : www.varimanglobal.com



**Vivek Surana & Associates**  
Practicing Company Secretaries

6-3-354/13/A1, First Floor, Suryateja Apts.,  
Hindi Nagar, Panjagutta, Hyderabad - 500 034.  
Ph: +91 9959 581348  
E-mail: viveksurana24@gmail.com

**Secretarial Compliance Report of Variman Global Enterprises Limited  
for the year ended 31.03.2020**

We, Vivek Surana & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by Variman Global Enterprises Limited (previously known as Spring Fields Infraventures Limited) ("the listed entity"),
- (b) The filings / submissions made by the listed entity to the stock exchange (BSE Limited),
- (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 31<sup>st</sup> March, 2020 ("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 there under; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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**





- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under;

And based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued there under wherever applicable, 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
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued wherever applicable, there under in so far as it appears from my/our examination of those records.
- (c) The following are the 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 there under:

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.
1	BSE	Regulation 34 – Late Submission of Annual report for the Financial year 2018-19	Penalty imposed	Penalty waived off by BSE

- (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 previous reports	Observations made in the Secretarial compliance report for the year ended 31 <sup>st</sup> March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

We certify that the Company has complied with Clause 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: Hyderabad  
Date: 25-07-2020

For Vivek Surana & Associates  
Practicing Company Secretaries

Vivek Surana  
Proprietor  
M. No.A24531, CP No: 12901  
UDIN: A024531B000504802

