

To,

Date: 30.06.2021

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

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31.03.2021 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 31.03.2021 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

**Secretarial Compliance Report of Variman Global Enterprises Limited
for the year ended 31.03.2021**

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 ("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,

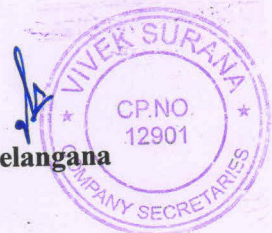
For the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

- (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**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **During the year under review, there was no instance to be reported by the Company under the SEBI Takeover Code.**

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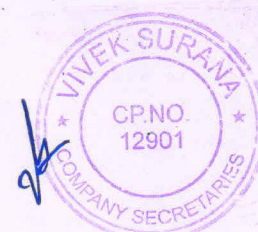


- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) 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 thereunder;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not Applicable**
- (j) CIR/CFD/CMD1/114/2019 dated October 18, 2019 (Resignation of statutory auditors from listed entities and their material subsidiaries); **Not Applicable**
- (k) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (l) SEBI circular HO/DDHS/CIR/P/2018/144 dated November 26, 2018 disclosure of large Corporate; **Not Applicable**

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
1	Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015	Non-payment of Annual Listing Fees for the year 2020-21	The Company was required to pay annual listing fees for the year 2020-21 within the due date, but the same was paid on 14.05.2021 with interest



(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued wherever applicable, there under insofar 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.
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 previous reports	Observations made in the Secretarial compliance report for the year ended 31 st March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For Vivek Surana & Associates
Practicing Company Secretaries



Vivek Surana
Proprietor
M. No.A24531, CP No: 12901
UDIN: A024531C000545117

Place: Hyderabad
Date: 30.06.2021