

From,
Miven Machine Tools Limited
C/o Miven Mayfran Conveyors Private Limited,
Sirurs Compound, Karwar Road,
Hubli Dharwad KA 580024 IN
CIN: L29220KA1985PLC007036
Email: mtsecretarial@gmail.com
Website: www.mivenmachinetools.com

May 30, 2022

BSE Limited
24th Floor, P J Towers, Dalal Street, Fort
Mumbai-400001

Submitted electronically through BSE Listing Centre

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year 2021-22

Ref: Scrip Code: 522306

As you are aware all listed entities on an annual basis are required to arrange to conduct a verification by a Practicing Company Secretary("PCS") on compliance of all applicable SEBI Regulations and circulars/ issued thereunder, consequent to which, the PCS shall submit the Annual Secretarial Compliance Report ("ASCR") in the manner and format specified in the SEBI circular mentioned above. The listed entity shall submit the ASCR to the stock exchanges within 60 days of the end of the financial year in the manner specified in the SEBI circular mentioned above.

Accordingly, we wish to inform you that the Company has received the Annual Secretarial Compliance Report ("ASCR") for the Financial Year 2021-22 from Mr. Umesh P Maskeri, Practicing Company Secretary in the format stipulated in the Circular issued by SEBI referred to Above.

We are submitting the said ASCR dated May 30, 2022 which was placed and approved by the Board of Directors at the meeting held on May 30, 2022.

Yours faithfully
For Miven Machine Tools Limited,



Arpita Dhakane
Company Secretary and Compliance Officer



Umesh Parameshwar Maskeri
Practicing Company Secretary

No 304, Geetanjali Heights, Plot No.77, Sector 27
Near Presentation Convent School, Nerul East, Navi Mumbai-400 706
Tele 022 -27716919; Mobile: 09930178352; Email: umeshmaskeri@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT
For the Financial Year ended March 31, 2022
Pursuant to Circular No CIR/CFD/CMD1/27/2019 dated February 8, 2019
Issued by the Securities and Exchange Board of India

To
The Members,
Miven Machine Tools Limited
C/o Miven Mayfran Conveyors Private Limited
Sirurs Compound, Karwar Road
HUBLI -580024

Dear Sir,

I, Mr. Umesh P Maskeri, Practicing Company Secretary, have examined:

- a) All the documents and records made available to me and explanation provided by Miven Machine Tools 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

for the year ended March 31, 2022 ("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 Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, Circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specified 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;

Umesh Maskeri



Umesh Parameshwar Maskeri
Practising Company Secretary

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employees Benefits and Sweat Equity) Regulations, 2021;
- (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;
- (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 information, 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 the following matters;

Sl No	Compliance requirement (Regulations/Circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1	Company is required to maintain a functional web site and display the financial results, Share Holding pattern, periodical filings, policies, disclosures and various other documents and information in respect of the matters mentioned in Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The website of the company viz, www.machinetools.in was not functional and hence the Company has not displayed the required information and documents on the website.	Company has not complied with the provisions of Regulation 46 of SEBI LODR.

- (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 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 Instructions issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder:

Umesh Maskeri



Umesh Parameshwar Maskeri
Practising Company Secretary

Sl. No	Action taken by	Details of violation	Details of action taken E.g. Fines, warning letter, debarment etc.	Observations/ remarks of the Practising Company Secretary, if any
No such action was taken against the listed entity / its promoters/ directors/material subsidiaries either by SEBI or by Stock Exchanges by SEBI				

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

Sl No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2019 and March 31, 2020	Action taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
There were no adverse observations and hence no action was warranted by the listed entity				

Sl No	Observations made in the secretarial compliance report for the year ended March 31, 2021	Action taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
	Company is required to maintain a functional web site and display the financial results, Share Holding pattern, periodical filings, policies, disclosures and various other documents and information in respect of the matters mentioned in Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The website of the	Company has taken corrective action and has now maintained a functional website http://mivenmachinetools.com	Company has since taken corrective action and has displayed the required material on the website



**Umesh Parameshwar Maskeri
Practicing Company Secretary**

	company viz, www.mivenmachinetools.in was not functional and hence the Company has not displayed the required information and documents on the website.		
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Umesh P. Maskeri

**UMESH PARAMESHWAR MASKERI
PRACTICING COMPANY SECRETARY
FCS No 4831 COP No. 12704
ICSI UDIN F004831D000422721
Peer Review Certificate No 653/2020**



Place: Mumbai
Date : May 30, 2022

Note: This report is to be read with my letter of even date which is annexed as ANNEXURE I and forms an integral part of this report.



Umesh Parameshwar Maskeri
Practicing Company Secretary

ANNEXURE I

To
The Members,
Miven Machine Tools Limited
C/o Miven Mayfran Conveyors Private Limited
Sirurs Compound, Karwar Road
HUBLI -580024

Our report of even date is to be read along with this letter:

1. Compliance with the provisions of SEBI (Listing Obligations and disclosure Requirements) Regulations, 2015 and the SEBI regulations and Circulars is the responsibility of the management of the Company. My responsibility is to express an opinion on these compliances based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the compliance of SEBI LODR, SEBI regulations and SEBI Circulars. The verification was done on test basis to ensure that correct facts are reflected in the compliance records. I believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of SEBI LODR and other SEBI regulations on test basis.
6. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Umesh Maskeri

UMESH PARAMESHWAR MASKERI
PRACTICING COMPANY SECRETARY
FCS No 4831 COP No. 12704
Peer Review Certificate No 653/2020



Place: Mumbai
Date : May 30, 2022