



**PANTH Infinity**  
INTENDED TO INSPIRE

## PANTH INFINITY LIMITED

CIN: L45201GJ1993PLC114416

Reg. Office: 32, Rajsukh complex, Behind Hyatt Regency Lane,  
Opp. Gujarat Vidyapith, Income tax, Ashram Road, Ahmedabad - 380014  
Phone No.: +91 7779005341 | Website: www.panthinfinity.com  
E-mail: panthcompliance@gmail.com, info@panthinfinity.com

Date: 30/05/2024

To, Department of Corporate Services <b>BSE Limited</b> P. J. Towers, Dalal street, Mumbai-400 001, Maharashtra. <b>BSE Code: 539143</b>	To, The Compliance Department <b>The Calcutta Stock Exchange Limited</b> 7, Lyons Range, Dalhousie, Kolkata-700001, West Bengal <b>CSE Code: 30010</b>
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**SUB.: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024.**

Dear Sir/Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular no. CIR/CFD/CMD 1/27/2019 dated February 08, 2019, we are enclosing herewith Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2024 issued by Mr. Mukesh Jiwnani, Practicing Company Secretary, Ahmedabad.

Kindly take the same on your record and oblige.

Thanking you.

Yours faithfully

Kindly take a note of the same.

**FOR, PANTH INFINITY LIMITED**

\_\_\_\_\_  
**SENDHABHAI AMRUTBHAI MAKVANA**  
**CHAIRMAN AND MANAGING DIRECTOR**  
**DIN: 09756503**



# MUKESH J & ASSOCIATES

(Company Secretaries)  
Firm No. S2021GJ796900

Date: 30/05/2024

To,

The Board of Directors of

**PANTH INFINITY LIMITED**

32, Rajsukh complex, Behind Hyatt Regency Lane, Opp. Gujarat Vidyapith, Income tax, Ashram Road, Ahmedabad, Gujarat, 380014

I have been engaged by PANTH INFINITY LIMITED (hereinafter referred to as 'the Company') bearing CIN: L45201GJ1993PLC114416 whose equity shares are listed on BSE Limited (Security Code: 539143) The Calcutta Stock Exchange Limited (Security Code: 30010) and to issue the Annual Secretarial Compliance Report in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars Guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and Circulars Guidelines issued thereunder from time to time and issue a report thereon. The certification was conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.





SECRETARIAL COMPLIANCE REPORT  
OF  
PANTH INFINITY LIMITED  
(CIN: L45201GJ1993PLC114416)  
FOR THE YEAR ENDED 31ST MARCH, 2024

I, Mukesh Jiwnani, Practicing Company Secretary, Ahmedabad have examined:

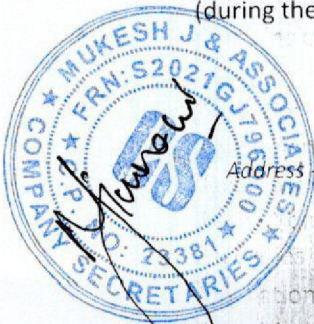
- (a) All the documents and records made available to us and explanation provided by **PANTH INFINITY LIMITED** ("the listed entity"),  
(b) The filings/ submissions made by the listed entity to the stock exchanges,  
(c) Website of the listed entity,  
(d) Any other document/ filing, as may be relevant, which has been relied upon to make this Certification,

For the year ended 31<sup>st</sup> March, 2024 ("Review Period") in respect of compliance with 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;  
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 (during the period under review not applicable to the Company); - **Not applicable during the period under review**  
e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(during the period under review not applicable to the Company); - **Not applicable during the period under review**  
f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (during the period under review not applicable to the Company);





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- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (during the period under review not applicable to the Company); **Not applicable during the period under review**
- 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;
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (during the period under review not applicable to the Company); - **Not applicable during the period under review**

And based on the above examination and confirmation received from management of the company as and wherever required, 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)	Regulation/Circular No.	Deviations	Actions Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary, if any.	Management Response	Remarks
1	Appointment of Company Secretary and Compliance Officer	Regulation 6(1) SEBI LODR REGULATION S, 2015	Fill the vacancy of Company Secretary within 3 months	NA	NIL	The Company, being listed company has not filled the vacancy in the office of the Compliance Officer/Company Secretary within three months from the date of	INR Rs.38,000 /- Excluding GST	The Company, being listed company has not filled the vacancy in the office of the Compliance Officer/Company Secretary within three	The Company has appointed Company Secretary and Compliance Officer after 3 months Ms. SHALU GARG as on 08 <sup>th</sup> November, 2023.	-

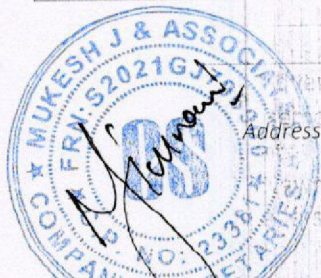




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						such vacancy.		months from the date of such vacancy		
2	Quarterly Reconciliation of Share Capital Audit Report	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018,	Company has not yet submitted the Reconciliation of Share Capital Audit Report in XBRL and in PDF for the quarter ended March 31, 2024	NA	NIL	Company has not yet submitted the Reconciliation of Share Capital Audit Report in XBRL and in PDF for the quarter ended March 31, 2024	-	Company has not yet submitted the Reconciliation of Share Capital Audit Report in XBRL and in PDF for the quarter ended March 31, 2024	The Company is in process to file the same.	-
3	Regulation 47	Advertisements in Newspapers	Delayed Submission of Newspaper Advertisement for the quarter ended 30 <sup>th</sup> June, 2023	NA	NIL	Newspaper Publication of Financial Results should be made within 48 hours of conclusion of the meeting of board of directors at which the financial results were approved	-	There was Delayed Newspaper Publication of Unaudited Financial Results for the Quarter ended 30 <sup>th</sup> June, 2023.	The Company has ensured due compliance of the same in future and has taken due action in order to ensure timely compliance in future.	



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4	Proceedings of General Meetings	Regulation 30(6) read with SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CI R/2023/123 dated July 13, 2023	Delayed Submission of Proceedings of General Meetings	NA	NIL	There is a delayed submission related to proceedings of annual general meeting, as required under reg. 30(6) read with schedule III of SEBI (LODR) Regulations, 2015	-	There is a delayed submission related to proceedings of annual general meeting, as required under reg. 30(6) read with schedule III of SEBI (LODR) Regulations, 2015	The delay in filing of the proceedings of the AGM was due to short business hours during festive time of Milad un-Nabi/Id-e-Milad therefore it caused an inadvertent delay in submission of proceedings of Annual General Meeting (AGM) held on 29.09.2023. The Company had submitted the proceedings of AGM within 24 hours instead of 12 hours. We assure that we will be careful in future and would like to state that the Company has been regular in adhering to the compliances under the Listing Regulations and other applicable laws.	-
5	Replacement of new Independent Director in place of Resigning Independent Director	Regulation 25(6) of SEBI (LODR) Regulations, 2015	Non appointment of Independent Director to fill casual vacancy caused by resignation of	NA	Nil	Non appointment of Independent Director to fill casual vacancy caused by resignation of existing Independent Director	-	Non appointment of Independent Director to fill casual vacancy caused by resignation of existing Independent Director	The Company was in search of suitable candidates and on finding such candidates the company has made appointment and made compliance with the said regulation.	



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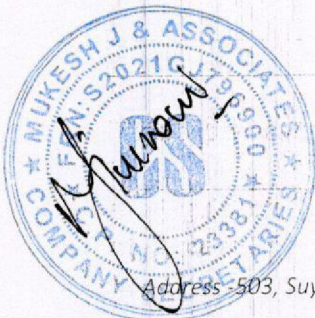
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			existing Independent Director.			during the period from 01.08.2024 to 31.03.2024		during the period from 01.08.2023 to 02.03.2024		
6	System-driven Disclosures in Securities Market up to two levels below CEO of a Company	SEBI/H O/C FD/DC R1/ CIR/P/ 2018/ 85 dated 28-05-2018	Non submission of information in time with Designated Depository	NA	NIL	The Company has delayed submission of information with Designated Depository	Nil	Pursuant to requirement of System Driven Disclosure Circular, the Company has not submitted requisite information in time to Designated Depository.	The Company ensures the compliance of the same in future	-

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Actions Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary, if any.	Management Response	Remarks
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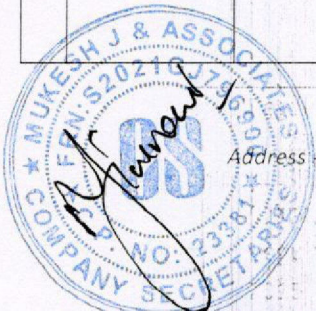
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1	System-driven Disclosures in Securities Market up to two levels below CEO of a Company	SEBI/HO/C FD/DCR1/ CIR/P/2018/ 85 dated 28-05-2018	Non submission of information in time with Designated Depository.	NA	Nil	The Company has delayed submission of information with Designated Depository	Nil	Pursuant to requirement of System Driven Disclosure Circular, the Company has not submitted requisite information in time to Designated Depository.	The Company has made compliance of the same in delay manner and has taken due action in order to ensure timely compliance in future too.	-
2	Number of Directors on the Board	Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015	The Company has not comprised minimum number of Directors on the Board.	NA	Nil	The Company has not comprised minimum number of Directors on the Board during the period from 01.10.2021 to 31.05.2022 and from 12.10.2022 to 17.10.2022	Nil	The Board of Directors did not comprise minimum 6 (Six) Directors during the period from 01.10.2021 to 31.05.2022 and from 12.10.2022 to 17.10.2022.	The Company has appointed Requisite number of Directors on the Board w.e.f. 01.06.2022 and w.e.f. 18.10.2022 respectively to rectify the deviation	-
4	Replacement of new Independent Director in place of Resigning Independent Director	Regulation 25(6) of SEBI (LODR) Regulations, 2015	Non appointment of Independent Director to fill casual vacancy caused by resignation of existing Independent Director.	NA	Nil	Non appointment of Independent Director to fill casual vacancy caused by resignation of existing Independent Director during the period from 01.10.2021 to	NA	Pursuant to Regulation 25(6) read with Regulation 17(1) of the SEBI (LODR) Regulations, 2015, the Company shall require minimum Three (3) Independent	The Company was in search of suitable candidates and on finding such candidates, the Company has appointed Two (2) Independent Directors w.e.f. 01.06.2022.	-



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					31.05.2022		Directors on its Board.			
5	In-principle approval of recognized stock exchange(s).	Reg. 28(1) of SEBI (LODR) Regulations, 2015	In-Principle approval not received from CSE	NA	Nil	The Company has not received in-principle approval from CSE before issuing Bonus Shares.	Nil	The Company has made timely application. However, no approval was received from CSE. The Company has received Listing approval from CSE on 11.04.2023.	The Company has submitted both in-principle and listing application to CSE in time. After continuous follow-up, the CSE has granted listing approval of issue of bonus shares to the Company on 11.04.2023.	-

(c) The Company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in the terms of appointment of Statutory Auditors of the Company.

(d) In terms of the BSE Circular No: 20230410-41 dated 10th April, 2023, our affirmations to the Report are given as Annexure-1.



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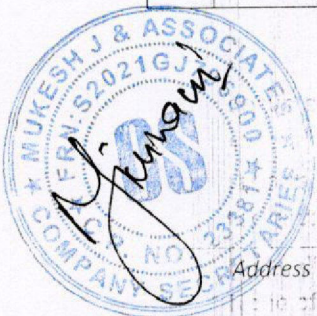


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## Annexure-1.

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1	<b>Secretarial Standard</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	-
2	<b>Adoption and timely updation of the Policies</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/ guidelines issued by SEBI.</li></ul>	Yes	As per the discussion with Management of the company, the company has mostly complied with the policies as notified by SEBI.
3	<b>Maintenance and disclosures on Website</b> <ul style="list-style-type: none"><li>The listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/information under a separate section on the website</li><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.</li></ul>	No	The Company has not updated functional website as required under regulation 47 of the SEBI (LODR) Regulation, 2015
4	<b>Disqualification of Director:</b> None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <ul style="list-style-type: none"><li>(a) Identification of material subsidiary companies</li><li>(b) Disclosure requirement of material as well as other subsidiaries</li></ul>	NA	There are no Subsidiary Company of the listed entity.



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# MUKESH J & ASSOCIATES

(Company Secretaries)  
Firm No. 52021GJ796900

6	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-
8	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or (b) In case no prior approval obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	- The Company has not entered into any such transactions
9	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Except as mentioned in Table (a) of the said report
10	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder <i>except as provided under separate paragraph above.</i>	Yes, action is taken	As per information provided in Table (a) above.



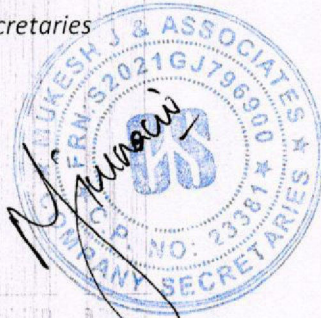


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12	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for all SEBI regulation/circular/guidance note, etc <i>except as provided under separate paragraph above.</i>	Yes, additional non-compliance observed	As per information provided in Table (a) above.
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**For Mukesh J & Associates**  
Practicing Company Secretaries



Mukesh Jiwnani  
Proprietor  
ACS No.: 29793  
C.P. : 23381  
Peer Review Certificate No.: 2874/2023  
UDIN: A029793F000505543

Date: 30/05/2024  
Place: Ahmedabad