

**Secretarial Compliance Report of COUNTRY CLUB HOSPITALITY &  
HOLIDAYS LIMITED (CIN: L70102TG1991PLC012714) for the year ended 31<sup>st</sup>  
March, 2022.**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **COUNTRY CLUB HOSPITALITY & HOLIDAYS 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, 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 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; (Hereinafter to be referred as 'SEBI (LODR) Regulations')
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the Company under 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; (Not applicable to the Company under the Review Period).
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company under the Review Period).
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company under the Review Period).



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the Company under 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 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 thereunder, except in respect of matters specified below:

S.NO.	COMPLIANCE REQUIREMENT (REGULATIONS / CIRCULARS / GUIDELINES INCLUDING SPECIFIC CLAUSE)	DEVIATIONS	OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY
1.	<b><u>Regulation 7(3) of SEBI (LODR), Regulations, 2015:</u></b> The listed entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within thirty days from the end of the financial year, certifying compliance with the requirements of sub-regulation (2).	There was an instance of delay of 2 Months & 3 days in submission of Certificate for the half year ended 31 <sup>st</sup> March, 2021 as required under Regulation 7(3) of SEBI (LODR) Regulations.	There was delay in submission of Certificate for the Half year ended 31 <sup>st</sup> March, 2021 as required under Regulation 7(3) of SEBI (LODR) Regulations.
2.	<b><u>Regulation 13(3) of SEBI (LODR), Regulations, 2015:</u></b> The listed entity shall file with the recognized stock exchange(s) on a quarterly basis, within twenty-one days from the end of each quarter, a statement giving the number of investor complaints	There was an instance of delay of 1 Month & 25 Days in submission of Statement of Investor Grievance for the Quarter ended 31 <sup>st</sup> March, 2021 as required under Regulation 13 (3) of	There was delay in submission of Statement of Investor Grievance for the Quarter ended 31 <sup>st</sup> March, 2021 as required under Regulation 13(3) of SEBI (LODR) Regulations.



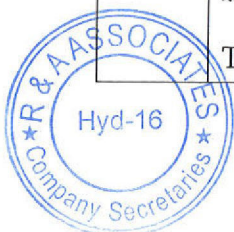
	pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	SEBI (LODR) Regulations.	
3.	<b><u>Regulation 14 of SEBI (LODR), Regulations, 2015:</u></b> The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange(s), in the manner specified by the Board or the recognized stock exchange(s).	There was an instance of delay in payment of Annual listing Fees to the both the Stock Exchanges for the Financial Year 2021-22 as required under Regulation 14 of SEBI (LODR) Regulations.	There were delay in payment of Annual Listing Fees payable to both the Stock Exchanges i.e. National Stock Exchange (NSE) & Bombay Stock Exchange (BSE) as required under Regulation 14 of SEBI (LODR) Regulations.
4.	<b><u>Regulation 17(3) of SEBI (LODR), Regulations, 2015:</u></b> The board of directors shall periodically review compliance reports pertaining to all laws applicable to the listed entity, prepared by the listed entity as well as steps taken by the listed entity to rectify instances of non-compliances.	There were instances when the Board of Directors has not periodically reviewed the Compliance Reports pertaining to all Laws applicable to the Company and steps taken to rectify instances of non-compliances as required under Regulation 17(3) of the SEBI LODR Regulations.	The Board of Directors of the Listed Entity has not periodically reviewed the Compliance Reports pertaining to all Laws applicable to the Company and also did not review the steps taken to rectify instances of non-compliances, if any as required under Regulation 17(3) of the SEBI LODR Regulations.
5.	<b><u>Regulation 18(2)(a) of SEBI (LODR), Regulations, 2015:</u></b> The Audit Committee shall meet at least four times in a year and not more than one hundred and twenty days shall elapse between two meetings.	There was an instance where the maximum Gap between two Audit Committee Meetings held on 12 <sup>th</sup> February, 2021 and 30 <sup>th</sup> June, 2021 exceeded 120 days i.e. 137 days as required under Regulation 18 (2)(a) of SEBI LODR Regulations.	The maximum Gap between two Audit Committee Meetings held on 12 <sup>th</sup> February, 2021 and 30 <sup>th</sup> June, 2021 exceeded 120 days as required under Regulation 18 (2)(a) of SEBI LODR Regulations.



6.	<p><b><u>Regulation 24(2) SEBI (LODR) Regulations, 2015:</u></b></p> <p>The Audit Committee of the listed entity shall also review the financial statements, in particular, the investments made by the unlisted subsidiary.</p>	<p>There were instances when the Audit Committee of the Listed Entity did not reviewed the Financial Statements of its Unlisted Subsidiaries as required under Regulation 24(2) of SEBI LODR Regulations.</p>	<p>The Audit Committee of the Listed Entity did not review the Financial Statements of the Unlisted Subsidiary.</p>
7.	<p><b><u>Regulation 24(3) SEBI (LODR) Regulations, 2015:</u></b></p> <p>The minutes of the meetings of the board of directors of the unlisted subsidiary shall be placed at the meeting of the board of directors of the listed entity.</p>	<p>There were instances when the Company did not place the Board Meeting Minutes of its Unlisted Subsidiaries at the Meetings of the Board of Directors of the Listed Entity as required under Regulation 24(3) of SEBI LODR Regulations.</p>	<p>The Listed Entity did not place the Board Meeting Minutes of its Unlisted Subsidiaries at the Meetings of the Board of Directors as required under Regulation 24(3) of SEBI LODR Regulations.</p>
8.	<p><b><u>Regulation 24A of SEBI (LODR), 2015 read with SEBI circular CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019:</u></b></p> <p><b><u>Annual Secretarial Compliance Report (ASCR):</u></b></p> <p>The Annual Secretarial Compliance Report in the prescribed format shall be submitted by the listed entity to the stock exchanges within 60 days of the end of the financial year.</p>	<p>There was an instance of delay of 4 Months &amp; 18 Days in submission of Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 by the Listed Entity to the Stock Exchanges as required under Regulation 24A (2) of SEBI (LODR) Regulations read with SEBI Circular CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and the report submitted to the Stock Exchanges was incomplete.</p>	<p>There was delay in the submission of Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 Exchanges as required under Regulation 24A (2) of SEBI (LODR) Regulations read with SEBI Circular CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019 and the report submitted to the Stock Exchanges was incomplete.</p>
9.	<p><b><u>Regulation 27(2)(a) of SEBI (LODR) Regulations, 2015:</u></b></p> <p>The listed entity shall submit a</p>	<p>There was an instance of delay of 2 Months in submission of the</p>	<p>There was delay in submission of the Quarterly Compliance</p>

	quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognized stock exchange(s) within twenty-one days from the end of each quarter.	Quarterly Compliance Report on Corporate Governance for the Quarter ended 31 <sup>st</sup> March, 2021 as required under Regulation 27(2) of SEBI LODR Regulations.	Report on Corporate Governance for the Quarter ended 31 <sup>st</sup> March, 2021 as under Regulation 27(2) of SEBI LODR Regulations.
10.	<b><u>Schedule II Part A sub para D of Para of SEBI (LODR) Regulations, 2015:</u></b>  Minutes of meetings of audit committee and other committees of the board of directors.	There was an instance when the Listed Entity did not disclose the details of the Nomination & Remuneration Committee (NRC) Meeting held during the Quarter ended 31 <sup>st</sup> March, 2022 as required under Schedule II Part A sub para D of SEBI (LODR) Regulations, 2015.	The Quarterly Report on Corporate Governance submitted by the Listed Entity for the Quarter ended 31 <sup>st</sup> March, 2022 did not disclose the details of Meeting of the NRC.
11.	<b><u>Regulation 29 (1) &amp; proviso to sub-regulation (2) of the SEBI (LODR) Regulations 2015:</u></b>  (1) The listed entity shall give prior intimation to stock exchange about the meeting of the board of directors in which any of the following proposals is due to be considered: (a) financial results viz. quarterly, half yearly, or annual, as the case may be; (2) Provided that intimation regarding item specified in clause (a) of sub-regulation (1), to be discussed at the meeting of board of directors shall be given at least five days in advance (excluding the date of the	There was an instance of delay of 1 day in submission of prior intimation of Board Meeting to the Stock Exchanges held on 12 <sup>th</sup> November, 2021 for approving the Financial Results for the quarter ended 30 <sup>th</sup> September, 2021 as required under Regulation 29 (1) & proviso to sub-regulation (2) of the SEBI (LODR) Regulations.	There was a delay in submission of prior intimation of the Board Meeting to the Stock Exchanges held on 12 <sup>th</sup> November, 2021 for approving the Financial Results for the quarter ended 30 <sup>th</sup> September, 2021 as required under Regulation 29(1) & proviso to sub-regulation (2) of the SEBI (LODR) Regulations.

	intimation and date of the meeting), and such intimation shall include the date of such meeting of board of directors.		
12.	<p><b><u>Regulation 30 read with Schedule III PART A sub para B of SEBI (LODR) Regulations, 2015:</u></b></p> <p>(1) Every listed entity shall make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.</p> <p>(2) Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure of such events.</p> <p>(3) The listed entity shall make disclosure of events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality, as specified in sub-regulation (4).</p> <p><b><u>Schedule III PART A sub para B:</u></b> Outcome of Meetings of the board of directors: The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following: h) financial results;</p>	There was an instance of delay of 54 Seconds in submission of Financial Results to the National Stock Exchange of India for the Quarter ended 30 <sup>th</sup> September, 2021 in the Board Meeting held on 12 <sup>th</sup> November, 2021 as required under Regulation 30 read with Schedule III PART A sub para B of SEBI (LODR) Regulations, 2015.	There was delay of 54 Seconds in submission of Financial Results approved in the Board Meeting held on 12 <sup>th</sup> November, 2021 to the National Stock Exchange of India for the Quarter ended 30 <sup>th</sup> September, 2021 as required under Regulation 30 read with Schedule III PART A sub para B of SEBI (LODR) Regulations, 2015.
13.	<p><b><u>Regulation 30(6) read with Schedule III PART A PARA A sub para 13 of SEBI (LODR) Regulations, 2015:</u></b></p> <p>The listed entity shall first</p>	There was an instance of delay of 31 minutes in submission of Proceedings of the Annual General Meeting held on 30 <sup>th</sup>	There was delay of 31 Minutes in submission of Proceedings of the Annual General Meeting held on 30 <sup>th</sup> September, 2021 as



<p>disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information:</p> <p>Provided that in case the disclosure is made after twenty-four hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay:</p> <p>Provided further that disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within the timelines specified therein.</p> <p><b><u>Schedule III PART A PARA A sub para 13:</u></b></p> <p>Proceedings of Annual and extraordinary general meetings of the listed entity.</p>	<p>September, 2021 by the Listed Entity to the National Stock Exchange of India as required under Regulation 30(6) read with Schedule III PART A sub para 13 of Para A of SEBI (LODR) Regulations.</p>	<p>required under Regulation 30(6) read with Schedule III PART A sub para 13 of Para A of SEBI (LODR) Regulations.</p>
<p>14. <b><u>Regulation 31(1)(b) of SEBI (LODR), Regulations 2015:</u></b></p> <p>The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, in the format specified by the Board on a quarterly basis, within twenty-one days from the end of each quarter.</p>	<p>There was an instance of delay in submission of Shareholding Pattern with the Stock Exchanges for the quarter ended 31<sup>st</sup> March, 2021 as required under Regulation 31 of SEBI (LODR) Regulations, 2015.</p>	<p>There was a delay in submission of Shareholding Pattern with the Stock Exchanges for the quarter ended 31<sup>st</sup> March, 2021 as required under Regulation 31 of SEBI (LODR) Regulations, 2015.</p>



15.	<p><b><u>Regulation 34(1)(a) of SEBI (LODR) Regulations, 2015:</u></b></p> <p>The listed entity shall submit to the stock exchange and publish on its website-</p> <p>(a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders;</p>	<p>There was an instance of delay of 1 day in submission of Annual Report to the Stock Exchanges by the Listed Entity as required under Regulation 34(1)(a) of SEBI (LODR) Regulations, 2015.</p>	<p>There was an instance of delay of 1 day in submission of Annual Report to the Stock Exchanges by the Listed Entity as required under Regulation 34(1)(a) of SEBI (LODR) Regulations, 2015.</p>
16.	<p><b><u>Regulation 40(9) of SEBI (LODR) Regulations, 2015:</u></b></p> <p>The Company shall ensure that the STA produces a Certificate from a practicing CS within 1 month of the end of each Half Year, certifying that all the certificates have been issued within 30 days of the date of lodgment for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies.</p>	<p>There was an instance of delay of 2 Months 3 Days in submission of Certificate from Practicing Company Secretary for the half year ending 31<sup>st</sup> March, 2021 to the Stock Exchanges as required under Regulation 40(9) of SEBI (LODR) Regulations, 2015.</p>	<p>There was a delay in submission of Certificate from Practicing Company Secretary for the half year ending 31<sup>st</sup> March, 2021 to the Stock Exchanges as required under Regulation 40(9) of SEBI (LODR) Regulations, 2015.</p>
17.	<p><b><u>Regulation 46 of SEBI (LODR) Regulations, 2015:</u></b></p> <p>As per Regulation 46, the listed entity shall disseminate certain information as contained in the aforementioned Regulation.</p>	<p>There were few instances of non-compliance of Website requirements which is required as required under Regulation 46 of SEBI (LODR) Regulations, 2015.</p>	<p>There were few instances of non-disclosure of certain information as required to be disclosed on website as required under Regulation 46 of SEBI (LODR) Regulations, 2015.</p>
18.	<p><b><u>Regulation 74(5) of SEBI (DP) Regulations, 2018:</u></b></p> <p>The Listed Entity shall within fifteen days of receipt of the certificate of security from the participant the issuer shall confirm to the depository that securities comprised in the said certificate have been</p>	<p>There were instances of delay in submission of certificate under Regulation 74(5) of SEBI (DP) Regulations, 2018 for the quarters ended on 31<sup>st</sup> March, 2021 and 30<sup>th</sup> September, 2021.</p>	<p>There was delay in submission of certificates under Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018 for the quarters ended on 31<sup>st</sup> March, 2021 and 30<sup>th</sup> September, 2021.</p>



	<p>listed on the stock exchange or exchanges where the earlier issued securities are listed and shall also after due verification immediately mutilate and cancel the certificate of security and substitute in its record the name of the depository as the registered owner and shall send a certificate to this effect to the depository and to every stock exchange where the security is listed.</p>		
19.	<p><b><u>Regulation 76 of SEBI (DP) Regulations, 2018:</u></b></p> <p>Every issuer shall submit audit report on a quarterly basis, starting from September 30, 2003, to the concerned stock exchanges audited by a qualified Chartered Accountant or a practicing Company Secretary 11[or a practicing Cost Accountant], for the purposes of reconciliation of the total issued capital, listed capital and capital held by depositories in dematerialized form, the details of changes in share capital during the quarter and the in-principle approval obtained by the issuer from all the stock exchanges where it is listed in respect of such further issued capital.</p>	<p>There was an instance of delay in submission of Certificate/Audit Report by Practicing Company Secretary for the quarter ended 31<sup>st</sup> March, 2021 as required under Regulation 76 of the SEBI (DP) Regulations, 2018.</p>	<p>There was delay in submission of Certificate/Audit Report by Practicing Company Secretary for the quarter ended 31<sup>st</sup> March, 2021 as required under Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018.</p>
20.	<p><b><u>Schedule-B of SEBI (PIT), 2015:</u></b></p> <p>As per Schedule B of SEBI (PIT), 2015 read with NSE Circular dated 02<sup>nd</sup> April, 2019, "Trading restriction period can be made applicable from</p>	<p>There was an instance wherein Trading Window for the Designated Person for the quarter ended 31<sup>st</sup> March, 2021 was not</p>	<p>Trading Window for the Designated Person for the quarter ended 31<sup>st</sup> March, 2021 was not closed as required under Schedule B to the SEBI (PIT) Regulations,</p>



	<p>the end of every quarter till 48 hours after the declaration of financial results.”</p>	<p>closed.</p> <p>Further, there was delay in closure of Trading window for the Designated Persons for the Quarters ended 30<sup>th</sup> June, 2021, 30<sup>th</sup> September, 2021 and 31<sup>st</sup> December, 2021 to the stock exchanges as required under Schedule B to the SEBI (PIT) Regulations, 2015 read with NSE Circular dated 02<sup>nd</sup> April, 2019.</p>	<p>2015 read with NSE Circular dated 02<sup>nd</sup> April, 2019.</p> <p>Further, there was delay in closure of Trading window for the Designated Persons for the Quarters ended 30<sup>th</sup> June, 2021, 30<sup>th</sup> September, 2021 and 31<sup>st</sup> December, 2021 to the stock exchanges as required under Schedule B to the SEBI (PIT) Regulations, 2015 read with NSE Circular dated 02<sup>nd</sup> April, 2019.</p>
<p>21.</p>	<p><b>Regulation 34 of SEBI (LODR) Regulations, 2015:</b></p> <p>Annual Report of the Listed entity shall consist of minimum information as required under Regulation 34 read with Schedule -V of SEBI (LODR) Regulations, 2015.</p>	<p>There was an instance of omission of two key ratios i.e. Debtors Turnover and Inventory Turnover ratio in the Management Discussion and Analysis Report which is as required to be disclosed under Part B of Schedule-V of SEBI (LODR) Regulations, 2015 respectively.</p>	<p>There was omission of two key ratios i.e. Debtors Turnover, Inventory Turnover in the Management Discussion and Analysis Report which is as required to be disclosed under Part B and Part C of Schedule-V of SEBI (LODR) Regulations, 2015 respectively.</p>

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from 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:



S. 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.	National Stock Exchange	Non-compliance with Regulation 13(3), 17(1), 18(1), 19(1), 20(1), 27(2) and 31 of SEBI (LODR), 2015 for the Quarter ended 31 <sup>st</sup> March, 2021.	Fine of Rs. 14,26,620 including GST imposed on the Listed Entity vide letter dated 02 <sup>nd</sup> June, 2021.	The Listed Entity had made representation to the National Stock Exchange requesting for waiver of Fine for non-compliance of Regulations 13(3), 17(1), 18(1), 19(1), 20(1), 27(2) and 31 of SEBI (LODR), 2015 for the Quarter ended 31 <sup>st</sup> March, 2021 vide its application dated 02 <sup>nd</sup> August, 2021.  NSE vide its letters dated 10 <sup>th</sup> March, 2022 & 17 <sup>th</sup> March, 2022 decided to waive off the abovementioned fines.
		Non-compliance with Regulation 29(2) / 29(3) of SEBI (LODR), 2015 for the Quarter/Month ended 30 <sup>th</sup> November, 2021.	Fine of Rs. 11,800 including GST imposed on the Company vide letter dated 30 <sup>th</sup> December, 2021.	The Listed Entity has paid the penalty of Rs. 11,800 including GST for the Non-compliance of Regulation 29(2) / 29(3) of SEBI (LODR), 2015.
2.	Bombay Stock Exchange	Non-compliance with Regulation 13(3), 17(1), 18(1), 19(1)/19(2) 20(2)/(2A), 27(2) and 31 of SEBI (LODR), 2015 for the Quarter ended 31 <sup>st</sup> March, 2021.	Fine of Rs. 13,32,220 including GST was levied on the Company vide letter dated 17 <sup>th</sup> May, 2021.	The Listed Entity has made representation to Bombay Stock Exchange requesting for waiver of Fine for non-compliance of Regulation 13(3), 17(1), 18(1), 19(1)/19(2)
		Non-compliance with Regulation 29(2) /	Fine of Rs. 11,800 including GST was	20(2)/(2A), 27(2) and



		29(3) of SEBI (LODR), 2015.	levied on the Company vide letter dated 30 <sup>th</sup> December, 2021.	31 of SEBI (LODR), 2015 vide in its application dated 02 <sup>nd</sup> August, 2021.
		Non-compliance with Regulation 23(9) for quarter ended 30-Sep-2020 & 24(A) of SEBI (LODR), 2015.	Fine of Rs. 5,80,560 including GST was levied on the Company vide letter dated 25 <sup>th</sup> March, 2022.	<p>Accordingly, on the request made by the Listed Entity, the BSE in its E-Mail's dated 21<sup>st</sup> October, 2021 have waived off the fine imposed for the non-Compliance under Regulations 13(3) of SEBI (LODR), 2015.</p> <p>BSE in its emails (2 Mails) dated 01<sup>st</sup> December, 2021 have waived off the fine imposed for the non-Compliance under Regulations 27(2) and 31 of SEBI (LODR), 2015.</p> <p>Further, the Listed Entity has paid the penalty of Rs. 11,800 including GST for the Non-compliance of Regulation 29(2) / 29(3) of SEBI (LODR), 2015.</p>

(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 31 <sup>st</sup> March, 2021.	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
1.	The Company has not submitted the details of resignation of Independent Director Mr. Satyanarayana Raju w.e.f. 18 <sup>th</sup> April, 2019 in line with Schedule III, Part A, Para A, Clause (i) (ii) and (iii) of SEBI (LODR), 2015 to the Stock Exchanges.	As confirmed by the management, the Listed Entity has not submitted the details of Related Party Transactions to Stock Exchanges for the Half Year ended 31 <sup>st</sup> March, 2020 as required under Reg 23(9) of SEBI (LODR) Regulations.	Yes the Company has not submitted the details of Related Party Transactions to Stock Exchanges for the Half Year ended 31 <sup>st</sup> March, 2020 as required under Reg 23(9) of SEBI (LODR) Regulations.	The Company has acknowledged the non-submission.  However, the Company is yet to submit the same.
2.	There was an instance where, the Financial Results for the Financial Year ended 31 <sup>st</sup> March, 2019 which were submitted to the Bombay Stock Exchange (BSE) doesn't contain Independent Auditors Report, which is required under Regulation 33 of SEBI (LODR), 2015.	There was a delay in submission of details of Related Party Transactions to Stock Exchanges for the Half Year ended 30 <sup>th</sup> September, 2020 as required under Regulation 23(9) of SEBI (LODR) Regulations.	Yes, There was a delay in submission of details of Related Party Transactions to Stock Exchanges for the Half Year ended 30 <sup>th</sup> September, 2020 as required under Reg 23(9) of SEBI (LODR) Regulations. For the same the Exchanges has levied Penalties and the Company has requested for Waiver of the said Penalty.	The Company has acknowledged the delay. However, the Stock Exchanges had waived the penalties.
3.	The Listed Entity has not submitted the Compliance Certificate for the	As confirmed to us by the management, the company is yet to submit the	The Company has not yet submitted the Annual Secretarial	The Company has acknowledged the non-



	Half-year ended 31 <sup>st</sup> March, 2019 due to be filed during the reporting Period to the Stock Exchanges as required under Regulation 7(3) of SEBI (LODR), 2015.	Annual Secretarial Compliance Report for the financial year ended 31 <sup>st</sup> March, 2020.	Compliance Report for the financial year ended 31 <sup>st</sup> March, 2020.	submission.  However, the Company is yet to submit the same.
4.	There were instances of non-disclosure of Trading Window for the Quarters ended 30 <sup>th</sup> June, 2019 and 30 <sup>th</sup> September, 2019 to the stock exchanges as required by Schedule B to the SEBI (PIT) Regulations, 2015 read with NSE Circular dated 02 <sup>nd</sup> April, 2019.	The reason for resignation of Company Secretary was not given in the disclosures made to Stock Exchanges as required to be given as per SEBI Circular No. SEBI Circular No. CIR/CFD/CMD/4/2015.	Yes the reason for resignation of Company Secretary was not given in the disclosures made to Stock Exchanges as required to be given as per SEBI Circular No. SEBI Circular No. CIR/CFD/CMD/4/2015, as the Ex-Company Secretary herself has not given any reason to the Company as on date.	The Company has acknowledged the non-compliance and ensures to make necessary disclosures in future correspondences.
5.	There were instances of non-submission of details of Related Party Transactions to Stock Exchanges for the Half-Year ended 31 <sup>st</sup> March, 2019 and 30 <sup>th</sup> September, 2019 as required under Regulation 23(9) of SEBI (LODR), 2015.	Brief Profile details was not given in respect of disclosures made to Stock Exchanges regarding Appointment of Company Secretary on 05 <sup>th</sup> September, 2020 as required under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 09 <sup>th</sup>	Yes the Brief Profile details was not given in respect of disclosures made to Stock Exchanges regarding Appointment of Company Secretary on 05 <sup>th</sup> September, 2020 as required under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No.	The Company has acknowledged the non-compliance and ensures to make necessary disclosures in future correspondences.



		September, 2015.	CIR/CFD/CMD/4/2015 dated 9 <sup>th</sup> September, 2015.	
6.	There was an instance of non-disclosure of Brief Profile details in respect of disclosures made to Stock Exchanges regarding Appointment of Company Secretary on 17 <sup>th</sup> July, 2019 and on 13 <sup>th</sup> November, 2019, as required under Regulation 30 of SEBI (LODR), 2015.	Intimation under Regulation 30 for resignation of Mr. Venkata Ratna Kishore was not submitted to Stock Exchange.	Yes, Intimation under Regulation 30 for resignation of Mr. Venkata Ratna Kishore was not submitted to Stock Exchange.	The Company has acknowledged the non-submission.  However, the Company is yet to submit the same.
7.	There was an instance of non-submission of Annual Secretarial Compliance Report for the year ended 31 <sup>st</sup> March, 2019 under Regulation 24A of SEBI (LODR), 2015 to the Stock Exchanges.	There was a delay of 1 day in filing of Shareholding Pattern with Stock Exchanges for the quarter ended 30 <sup>th</sup> September, 2020.	Yes there was a delay of 1 day in filing of Shareholding Pattern with Stock Exchanges for the quarter ended 30 <sup>th</sup> September, 2020.  Further, No Penalties has been levied by the Stock Exchanges.	The Company has acknowledged the delay.
8.	There were few instances of non-compliance of Website requirements which is required as per Regulation 46 of SEBI (LODR), 2015.	The Management Discussion and Analysis Report does not contain certain key financial ratios and the Corporate Governance Report does not contain the details of skills/expertise/competence of the board of	Yes the Management Discussion and Analysis Report does not contain certain key financial ratios and the Corporate Governance Report does not contain the details of skills/	The Company has acknowledged the non-compliance and ensures to include the same.



		directors which are required to be disclosed under Part B and Part C of Schedule-V of SEBI (LODR) Regulations, 2015 respectively.	expertise/competence of the board of directors which are required to be disclosed under Part B and Part C of Schedule-V of SEBI (LODR) Regulations, 2015 respectively.	
9.		Delay in submission to Stock Exchange certificate under Regulation 40 (9) for the half year ended 30 <sup>th</sup> September, 2020.	Yes there is a delay in submission to Stock Exchange certificate under Regulation 40 (9) for the half year ended 30 <sup>th</sup> September, 2020.  Further, No Penalties has been levied by the Stock Exchanges.	The Company has acknowledged the delay.
10.		The Company is yet to update their website with certain information as required to be disseminated under Regulation 46.	The Company has updated their website with major information as required to be disseminated under Regulation 46. Only few information has been left out.	Yes, the Company has updated its website to the maximum extent; however there are few information which are still needs to be uploaded on the website.
11.		Delay of 1 day in publication of financial results for the quarter ended 30 <sup>th</sup> September, 2020 in both English and Telugu Newspapers.	Yes there is a delay of 1 day in publication of financial results for the quarter ended 30 <sup>th</sup> September, 2020 in both English and	The Company has acknowledged the delay.





			Telugu Newspapers.  Further, No Penalties has been levied by the Stock Exchanges.	
12.		Format of the financial results published in the newspapers is not as per the SEBI Circular No, CIR/CFD/FAC/62 /2016 dated 05 <sup>th</sup> July, 2016.	Company has already published the financial results in the newspapers as per old format only.  However, No Penalties has been levied by the Stock Exchanges.	The Company has acknowledged the same and the Listed Entity have published the Financial Results in the new format after reporting of the same.
13.		The Listed Entity has not submitted certificate under Regulation 74(5) of SEBI (DP) Regulations, 2018 for the quarters ended on 30 <sup>th</sup> June, 2020 and 30 <sup>th</sup> September, 2020.	Yes the Listed Entity has not submitted certificate under Regulation 74(5) of SEBI (DP) Regulations, 2018 for the quarters ended on 30 <sup>th</sup> June, 2020 and 30 <sup>th</sup> September, 2020.	The Company has acknowledged the non-compliance.  However, the Company is yet to submit the same.
14.		As informed to us by the Management, the Company has delayed informed the stock exchanges, regarding closure of Trading Window for the quarters ended 30 <sup>th</sup> June, 2020, 30 <sup>th</sup> September, 2020 and 31 <sup>st</sup> December, 2020 as required by Schedule B to the	Yes the Company has delayed informed the stock exchanges, regarding closure of Trading Window for the quarters ended 30 <sup>th</sup> June, 2020, 30 <sup>th</sup> September, 2020 and 31 <sup>st</sup> December, 2020 as required by Schedule B to the SEBI (PIT)	The Company has acknowledged the delay.



## Continuation sheet

		SEBI (PIT) Regulations, 2015 read with NSE Circular dated 02 <sup>nd</sup> April, 2019.	Regulations, 2015 read with NSE Circular dated 02 <sup>nd</sup> April, 2019.	
15.		Disclosure relating to Large Corporate Borrowers as per SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018 is not made to Stock Exchanges.	Yes the disclosure relating to Large Corporate Borrowers as per SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated 26 <sup>th</sup> November, 2018 is not made to Stock Exchanges.	The Company is yet to disclose the same.



For R&A Associates,  
Company Secretaries

*(Handwritten Signature)*

**R. Ramakrishna Gupta**

Senior Partner

FCS No.: #5523

COP No.: #6696

UDIN: F005523D000473265

Place: Hyderabad.

Date: 08<sup>th</sup> June, 2022