

**Shashijit Infraprojects Limited**  
Construction Engineers

T : +91 260 2432963, 78786 60609  
E : info@shashijitinfraprojects.com  
W : www.shashijitinfraprojects.com

**30<sup>th</sup> June, 2021**

To,  
**The Department of Corporate Services,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai-400001**

**Scrip Code** : 540147  
**Security ID** : SHASHIJIT

**Subject** : **Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021**

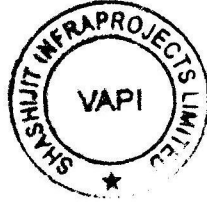
Dear Sir/Madam,

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosures) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019, please find attached herewith the Secretarial Compliance Report for the year ended 31st March, 2021, issued by Mr. Nitesh P. Shah, Practicing Company Secretary (UDIN: A035681C000551231)

This is for your information and records.

Yours Faithfully,  
**For SHASHIJIT INFRAPROJECTS LIMITED**

**(Manthan D. Shah)**  
**Company Secretary  
& Compliance Officer**  
**ACS 42509**



**Encl.** As above

*Nitesh P. Shah*

A.C.S.

**COMPANY SECRETARY**

1, Padmavati Apartment, Satyanarayan Society,  
Ramnagar, Sabarmati, Ahmedabad-380005.  
(M) 09429213780 E-mail : niteshshah16@gmail.com

**Secretarial compliance report of SHASHIJIT INFRAPROJECTS LIMITED (CIN:  
L45201GJ2007PLC052114) for the year ended 31<sup>st</sup> March, 2021**

I have examined:

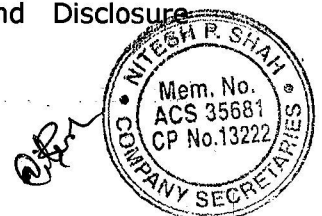
- (a) all the documents and records made available to me and explanation provided by SHASHIJIT INFRAPROJECTS LIMITED ("the Listed Entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 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 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;



(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 during the review period**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the review period**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during 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 during the review period**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

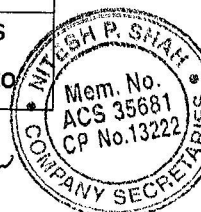
(i) the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018,

and circulars/ guidelines issued there under;

and based on the above examination, I hereby report that, during the Review Period:

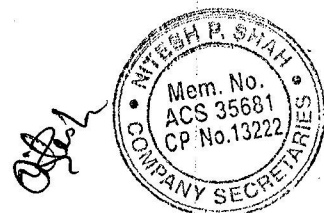
(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

Sr No	Compliance Requirement (Regulations/Circulars/ Guidelines including specific clause) (1)	Deviation (2)	Observations/Remarks of the Practicing Company Secretary (3)
1.	Pursuant to the provisions of Regulation 3(5) of the	The Listed Entity has not made entries in the	The Listed Entity has adopted the system to



<p>SEBI (Prohibition of Insider Trading) Regulations, 2015, the board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.</p>	<p>Structured Digital database in the manner as required under the Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	<p>maintain the Structured Digital Database as per the SEBI (Prohibition of Insider Trading) Regulations, 2015 but entries for some Unpublished Price Sensitive Information, which has been shared for the legitimate purposes, are not made in the database for the sharing of such Information.</p>
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar 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 Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr No	Action taken by	Details of Violation	Details of action taken	Observations/remarks of the Practicing Company Secretary
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 the previous reports	Observations made in the secretarial compliance report for the year ended	Action taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

(e) The reporting of clause 6(A) and 6(B) of the circular No: CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

Signature :   
 Name of the Practicing Company Secretary : Nitesh Parasmal Shah  
 ACS No : A35681  
 C. P. No : 13222  
 PR : 746/2020  
 UDIN : A035681C000551231



Place : Ahmedabad  
 Date : 30<sup>th</sup> June, 2021