

27<sup>th</sup> June, 2021

To,  
The General Manager,  
Department of Corporate Services,  
BSE Limited,  
1<sup>st</sup> Floor, P.J. Towers,0  
Dalal Street, Mumbai 400 001

To,  
The Manager,  
Listing Department,  
The National Stock Exchange of India Limited,  
Bandra-Kurla Complex,  
Mumbai – 400 051

Dear Sir,

**Subject: Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year Ended March 31, 2021**

**Scrip code: 532904/ SUPREMEINFRA**

We are enclosing herewith, Annual Secretarial Compliance Report pursuant to Regulation 24A of the the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read along with SEBI Circular CIR/CFD/CMD/1/27/2019 dated February 8, 2019, for the financial year ended March 31, 2021.

We request you to kindly take the above on record and oblige.

Thanking you.

Yours faithfully,

**FOR SUPREME INFRASTRUCTURE INDIA LIMITED**

VIKRAM  
BHAVANISHAN  
KAR SHARMA  
Digitally signed by VIKRAM  
BHAVANISHAN  
SHARMA  
DN: cn=2021.06.21 03:14:05  
+07'00'

**(VIKRAM SHARMA)  
MANAGING DIRECTOR**

Encl.: Above

**SUPREME INFRASTRUCTURE INDIA LIMITED**

Supreme House, Plot No. 94/C, Pratap Gad, Opp. I.I.T Main Gate, Powai, Mumbai- 400076.  
CIN: L74999MH1983PLC029752; Tel: + 91 22 6128 9700 Fax : + 91 22 6128 9711 Website : [www.supremeinfra.com](http://www.supremeinfra.com)



**SECRETARIAL COMPLIANCE REPORT OF SUPREME INFRASTRUCTURE INDIA LIMITED FOR  
THE YEAR ENDED MARCH 31, 2021**

I, **NIDHI BAJAJ**, Practicing Company Secretary have examined:

- a) All the documents and records made available to us and the explanation provided by '**SUPREME INFRASTRUCTURE INDIA LIMITED**' (CIN: L74999MH1983PLC029752) ('the listed entity');
- b) The filings / submissions made by the listed entity to the stock exchange;
- 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 March 31, 2021 ("Review Period") in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

1. Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (LODR) ;
2. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
4. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;  
**(Not applicable to the Company during the Review Period)**
5. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;  
**(Not applicable to the Company during the Review Period)**





A/401, Kailash Mansarovar, Amritvani Lane, Near Maxus Mall, Bhayander (West), Thane - 401 101

6. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;  
**(Not applicable to the Company during the Review Period)**
7. 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)**
8. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 thereunder, 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.	Declaration and submission of financial results - Regulation 33 of LODR	Yes	There was a delay in declaration and submission of financial results to the stock exchanges for the quarter and year ended March, 2020, quarter ended 30 <sup>th</sup> June, 2020, quarter and half year ended and 30 <sup>th</sup> September, 2019. The reason for delay in declaration of financial results stated above was duly intimated by the listed entity to the stock exchanges in accordance with LODR. Note: The last date of submission of Audited Financial Results for the Year ended 31 <sup>st</sup> March, 2020 is 31 <sup>st</sup> July, 2020 in terms of SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/106 dated 24 June, 2020. Till the issue of this Certificate, the Company has not submitted the above referred financial results to the Stock Exchange.
2	Appointment of woman director - Regulation 17 of LODR 	Yes	The Company appointed Payal Ashish Agarwal as Additional Independent Women Director in the Company w.e.f 1 <sup>st</sup> December, 2020. However the same resigned as on date 11 <sup>th</sup> June, 2021. Therefore, presently there is no Women Director in the Company.





3.	Regulation 17(2) – Number of Board Meeting	Yes	During the Year, the Company conducted 4 Board Meeting. As per General Circular No. 11/2020 as given by Ministry of Corporate Affairs, due to outbreak of global pandemic COVID-19, the Companies were given relaxation for intervals of 180 days (60 days additional) between two Board Meeting. However, it is observed that there is more than 180 days gap. As
4.	Regulation 29 – Prior Intimations	Yes	As per the respective Regulation provided by the SEBI, it is mandatory for the Listed Company to give prior intimation to Stock Exchange about the Meetings of the Board of Directors. However, the Company has failed to give prior intimation of the notice and outcome of the Board Meeting dated 16 <sup>th</sup> September, 2020 to the Stock Exchange.
5.	Regulation 46 - Website	Yes	As per the respective Regulation provided by the SEBI, it is mandatory for the Listed Company to maintain updated website of the Company. However, the Company's website is not fully up-to-date.
6.	Appointment of CFO	Yes	The Company is in search of appropriate candidate. Listed entity will be appointing a CFO once they find the suitable candidature for the same.
7.	Regulation 47 – Advertisement in Newspaper	Yes	As per respective Regulation provided by the SEBI, it is mandatory for the Listed Entity to provide the information as mentioned is Regulation 47(1)(a) to the respective Stock Exchange. However, the Company has failed to update the newspaper clippings to Stock Exchange.

- (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 my/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:





Sr. 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	Stock exchanges (NSE & BSE)	Delay in declaration of results under regulations 33 of LODR	Levied a fine to the listed entity	The listed entity has duly paid/in the process of paying all fine levied by the stock exchanges.

(d) 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 33 of LODR	Yes	There was a delay in declaration and submission of financial results to the stock exchanges for the quarter and year ended 31 <sup>st</sup> March, 2019, quarter ended 30 <sup>th</sup> June, 2019, quarter and half year ended 30 <sup>th</sup> September, 2019, quarter ended 31 <sup>st</sup> December, 2019 and quarter and year ended 31 <sup>st</sup> March, 2020. The reason for delay in declaration of financial results stated above was duly intimated by the listed entity to the Stock Exchanges in accordance with LODR. The Listed entity has duly paid all the fine levied by stock exchanges within stipulated time
2	Appointment of woman director - Regulation 17 of LODR	Yes	The Company appointed Payal Ashish Agarwal as Additional Independent Women Director in the Company w.e.f 1 <sup>st</sup> December, 2020.

Note: This report is to be read with our letter of even date which is "Annexure A" and forms an integral part of this report.





**NIDHI BAJAJ & ASSOCIATES**  
COMPANY SECRETARIES

Mobile: 9833297595

E-mail : csnidhi3388@gmail.com

---

A/401, Kailash Mansarovar, Amritvani Lane, Near Maxus Mall, Bhayander (West), Thane - 401 101

---

**FOR NIDHI BAJAJ & ASSOCIATES  
PRACTICING COMPANY SECRETARY**

**NIDHI BAJAJ  
PROPRIETOR  
ACS-28907  
COP - 14596**



**UDIN : A028907C000493382**

**Place: Mumbai  
Date: 21st June, 2021**





**Annexure to the Secretarial Audit Report:**

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

**Management's Responsibility**

1. It is the Responsibility of Management of the Company to maintain Secretarial records, device proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively.

**Auditor's Responsibility**

2. I have followed the audit practices and processes based on materiality wherever required to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on the test basis to ensure that correct facts are reflected in Secretarial records. I believe that the processes and practices, I 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. Where ever required, I have obtained the Management representation about compliance of laws, rules and regulations and happenings of events etc.

5. The compliance of provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of the management. Our examination was limited to the verification of procedures on test basis.

**Disclaimer**

6. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of efficacy or effectiveness with which the management has conducted the affairs of the Company.

**FOR NIDHI BAJAJ & ASSOCIATES  
PRACTICING COMPANY SECRETARY**

**NIDHI BAJAJ  
PROPRIETOR  
ACS-28907  
COP - 14596**



**UDIN : A028907C000493382**

**Place: Mumbai  
Date: 21<sup>st</sup> June, 2021**