

Date: 28th May, 2022

To,

Corporate Relationship Department,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001

Script Code: 517063

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by AVS & Associates, Practicing Company Secretaries for the year ended March 31, 2022.

This is for your information and records.

Thanking you.

Yours truly,
For **JETKING INFOTRAIN LIMITED**

PRITESH K. JHAVERI
COMPANY SECRETARY & COMPLIANCE OFFICER
ACS51446

Encl: a/a

AVS & ASSOCIATES

Company Secretaries (Peer Reviewed Firm)

Regd. Office: 1703, G-Square Business Park, Sector 30A, Near Sanpada Railway Station,
Sanpada, Navi Mumbai -400703, Maharashtra, India

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Secretarial Compliance Report of Jetking Infotrain Limited for the year ended March 31, 2022

We, AVS & Associates have examined:

- a) All the documents and records made available to us and explanations provided by **Jetking Infotrain Limited ("the Listed Entity" or "the Company")**,
- b) the filings/submissions made by the listed entity to the stock exchanges i.e. **BSE limited ('BSE')**,
- 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, 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;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**Not applicable to the Company during 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 during the review period**);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014/Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**Not applicable to the Company during the review period**);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008/Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (**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/Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (**Not applicable to the Company during 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 circulars/guidelines issued thereunder applicable to the listed entity.

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 matter specified below:-

No	Compliance Requirement (Regulations/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			

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 during the review period:

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.
Not Applicable				

d) The listed entity has taken the following actions to comply with the observations made in previous reports for the financial year ended March 31, 2021:

No.	Observations of the Practicing Company Secretary in the previous report for the year ended 31.3.2021	Observations made in the secretarial compliance report for the year ended 31.3.2021	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 made delay of 16 days in submission of its quarterly financial results for quarter ended June 30, 2020 to BSE Limited.	The Company has made delay of 16 days in submission of its quarterly financial results for quarter ended June 30, 2020 to BSE Limited.	The Company has made submissions of financial results and disclosure of related party transactions in delay to BSE and	The Company has taken necessary actions for submissions of financial results and disclosure of related party transactions to BSE

2.	The Company has made delay of 4 days in submission of its disclosure of related party transactions on consolidated basis for the half year ended September 30, 2020 to BSE Limited.	The Company has made delay of 4 days in submission of its disclosure of related party transactions on consolidated basis for the half year ended September 30, 2020 to BSE Limited.	also given explanations for the said delays in the board report of the company for the year ended March 31, 2021 stating that, in view of the outbreak of COVID-19 pandemic worldwide, the Company had followed norms and guidelines issued by the MHA and State government and adopted "Work from Home" Policy for its employees. Due to such limitation, the Company has faced difficulty of availability of enough staff in the office to carry out the compliances in a timely manner and subsequently financial result and disclosure of related party transactions were not submitted in time.	and complied with the said requirements in delay of 16 days & 4 days respectively. Further, the reasons for the said delays provided in the Board Report of the company for the year ended March 31, 2021 be and is hereby noted by us.
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Place: Navi Mumbai
Date: May 25, 2022

**For AVS & Associates
Company Secretaries**

**Anand Mukherjee
Partner
Membership No: F11804
CP No: 16883
Peer Review No: 1451/2021
UDIN: F011804D000386191**