



Date: 24th June, 2021

To,
BSE Limited
Department of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001.

Scrip Code: 517063

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Dear Sir/ Madam,

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, Please find enclosed herewith Annual Secretarial Compliance Report duly issued by M/S AVS & Associates, Company Secretaries, for the financial year ended 31st March, 2021.

This is for your information and record.

Thanking You,

Yours Truly,
For **Jetking Infotrain Limited**

YOGESH
ASHOK
PATOLE

Digitally signed
by YOGESH
ASHOK PATOLE
Date: 2021.06.24
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Yogesh Patole
Company Secretary

Encl: As above

AVS & ASSOCIATES

Company Secretaries

Regd. Office: S-27, Haware Fantasia Business Park, Next to Inorbit Mall, Sector 30A, Vashi, Navi
Mumbai - 400703, Maharashtra, India

Email: avsassociates16@gmail.com

Tel: 022-49785430 / 49785431 / 27810071

Secretarial Compliance Report of Jetking Infotrain Limited **for the year ended March 31, 2021**

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 exchange i.e. **BSE Limited**;
- 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:
 - 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 (**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**);

Anand
Subroto
Mukherjee

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- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 i) Securities and Exchange Board of India (Depositories and Participant) 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 matters specified below:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Submission of Quarterly Financial Results as per Regulation 33(3) of SEBI (LODR) Regulations, 2015	Delay in submission of Quarterly Financial Results of the Company to the stock exchange for quarter ended June 30, 2020	The Company has made delay of 16 days in submission of its quarterly financial results for quarter ended June 30, 2020 to BSE Limited.
2	Submission of disclosure of Related Party Transactions on consolidated basis as per Regulation 23(9) of SEBI (LODR) Regulations, 2015	Delay in submission disclosures of related party transactions on consolidated basis to the Stock Exchange for the half year ended September 30, 2020	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.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our examination of those records. However, we are not able to check and comment on structured digital database as required to be maintained under regulation 3(5) of SEBI (PIT), 2015 due to inability of our personal visit at office of the Company considering lockdown in the state due to COVID-19.

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 Mukherjee

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- 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:

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		Delay in submission of Quarterly Financial Results to the stock exchange for quarter ended June 30, 2020 by the Company	BSE vide email dated 16/10/2020 has imposed fine of Rs. 80,000/- (excluding GST) on the Company for delay in submission of its financial results to stock exchange for quarter ended June 30, 2020 i.e. delay of 16 days	The Company has made delay of 16 days in submission of its quarterly financial results to the stock exchange for the quarter ended June 30, 2020 and also paid imposed fine by BSE Limited for the same on 23/10/2020
2	BSE Ltd. (Stock Exchange)	Delay in submission disclosures of related party transactions on consolidated basis to the Stock Exchange for the half year ended September 30, 2020 by the Company	BSE vide email dated 18/01/2021 has imposed fine of Rs. 20,000/- (excluding GST) on the Company for delay in submission of its disclosures of related party transactions on consolidated basis to the Stock Exchange for the half year ended September 30, 2020 i.e. delay of 4 days	The Company has made delay of 4 days in submission of its disclosures of related party transactions on consolidated basis to the Stock Exchange for the half year ended September 30, 2020 and also paid imposed fine by BSE Limited for the same on 06/02/2021

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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 31.3.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Kalyan, Thane
Date: 23/06/2021

For AVS & Associates
Company Secretaries

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Subroto
Mukherjee

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Date: 2021.06.23 21:42:28 +05'30'

Anand Mukherjee
Partner
Membership No: A40485
CP No: 16883
UDIN: A040485C000505059

Note: Due to lockdown in the state because of COVID-19, we were not able to personally visit at the office of the company for verification of documents physically and hence obtained all the documents, details, information in electronic mode and taken necessary explanations, clarifications and representations either telephonically or electronically whenever required.