



SpiceJet Limited

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May 27, 2024

Department of Corporate Services,
BSE Limited,
Phiroz Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

Reference: Scrip Code: 500285 and Scrip ID: SPICEJET

Subject: Secretarial Compliance Report for the year ended March 31, 2024

Dear Sir,

In terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular dated February 8, 2019 bearing no. CIR/CFD/CMD1/27/2019, please find attached Secretarial Compliance Report of SpiceJet Limited for the year ended March 31, 2024.

This is for your information and records.

Thanking you,

Yours truly,
For SpiceJet Limited

Chandan Sand
Sr. VP (Legal) & Company Secretary

Encl.: As above

Mahesh Gupta & Company

Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092
Phone: 011-49503085, 9312406331 and E-mail: :maheshgupta.co@gmail.com

Secretarial Compliance Report of SpiceJet Limited for the financial year ended March 31, 2024

I, Mahesh Kumar Gupta, Practicing Company Secretary, have examined:

- all the documents and records made available to me and explanation provided by SpiceJet Limited (the “Listed Entity” or the “Company”),
- the filings/ submissions made by the Listed Entity to the stock exchanges,
- website of the Listed Entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this Report,

for the financial year ended March 31, 2024 (“Review Period”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulations) Act, 1956, 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:

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “SEBI LODR Regulations”);
- SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (the “SEBI ICDR Regulations”);
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- SEBI (Buy back of Securities) Regulations, 2018*;



* No event took place under these regulations during the financial year under review.

- e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021⁴;
- g) SEBI (Prohibition of Insider Trading) Regulations, 2015; and
- h) other regulations, circulars, guidelines issued thereunder as applicable to the Company;

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


I (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)	Regulation/ Circular No.	Deviations	Action Taken by	Type of action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
					Advisory/ Clarification/ Fine/Show Cause/Notice/ Warning etc.					
Refer Annexure A										


(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations/ remarks of the Practicing Company Secretary in the previous reports and observation made in the secretarial compliance report for the year ended March 31, 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
Refer Annexure B					

II. I hereby report that, during the Review Period the compliance status of the Listed Entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/Remarks by PCS
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI) <div style="text-align: center;">  </div>	No	(a) The interval between two consecutive board meetings (i.e. February 27, 2023 and July 12, 2023) was more than 120 days. (b) The annual general meeting of the Company for financial year ended on March 31, 2023 was held on January 10, 2024 and accordingly no annual general meeting was held during the calendar year ended December 31, 2023.

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/Remarks by PCS
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time, as per the regulations/ circulars/ guidelines issued by SEBI 	Yes	-
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) of the SEBI LODR Regulations are accurate and specific which re-directs to the relevant document(s)/ section of the website. 	Yes	-
4.	Disqualification of Director: None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	Two directors of the Company namely Mr. Ajay Singh and Mrs. Shiwani Singh were flagged under Section 164(2)(a) of the Companies Act, 2013 for non-filing of financial statements/annual return of certain companies in which they were/are directors. In accordance with the order passed by the Hon'ble High Court of Delhi and the Condonation of Delay Scheme 2018, the necessary filing has been completed.
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	-
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations.	Yes	

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/Remarks by PCS
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	- There is no related party transaction which was subsequently approved / ratified.
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations within the time limits prescribed thereunder.	Yes	-
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The Company has necessary software to maintain structured digital database and such database is being maintained internally with adequate internal control and checks. However, during the Review Period, no entry has been maintained in the software.
11.	Actions taken by SEBI or Stock Exchange(s), if any: The actions taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	No	Please refer Annexure – A of this report.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has /have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the SEBI LODR Regulations by listed entities.	N.A.	- 
13.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	Please refer Annexure – A of this report.

Assumptions and limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the Listed Entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the Listed Entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI LODR Regulations and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Mahesh Gupta & Company
Company Secretaries**


Mahesh Kumar Gupta
Proprietor
FCS 2870::CP 1999
UDIN: F002870F000452341



Date: 27th May, 2024
Place: Delhi

S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The board of directors shall comprise of not less than six directors and shall have at least one independent woman director.	Regulation 17(1) of the SEBI LODR Regulations	The Listed Entity has not appointed one independent woman director and the board of directors of the Listed Entity comprises of five directors.	BSE Limited	Fine	The Listed Entity has not appointed one independent woman director and the board of directors of the Listed Entity comprises of five directors instead of six. In other words the composition of board of directors of the Listed Entity is not in compliance of Regulation 17(1) of the SEBI LODR Regulations.	BSE Limited has imposed fine of Rs.5,900 per day until March 31, 2023 as per SOP issued by SEBI and has waived/exempted the fines for certain quarters basis application filed by the Company in terms of exchange policy for exemption of fines. However, during the Review Period, the Company has not received any letter for payment of fine in terms of SOP issued by SEBI.	The composition of the Board of Directors of the Listed Entity is not as per the requirement of the Regulation 17(1) of the SEBI LODR Regulations as the Listed Entity has not appointed one independent woman director and the total number of directors are less than six.	The airline industry has been one of the most affected sector due to unprecedented Covid-19 pandemic and is taking longer time to recoup considering the present economic condition and geopolitical factors. Due to cascading effect of Covid-19 pandemic and other factors, the Company's outstanding dues (including statutory dues) increased creating apprehension in the mind of prospective candidate for independent directorship. The duty and responsibilities of director prescribed under the applicable laws vis-à-vis present financial conditions of the Company is not encouraging prospective candidate for appointment in the Company as independent director. With recent infusion of fresh capital in January-February 2024 and stabilizing of the aviation sector, the Company	On appointment of one independent woman director, the Company will be in compliance of Regulation 17(1) of SEBI LODR Regulations.



S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
									has been able to identify a suitable woman candidate for appointment as independent director and has filled necessary application for security clearance of such candidature on May 15, 2024 as mandated by Civil Aviation Requirements of Ministry of Civil Aviation.	
2.	The board of directors shall meet at least four times a year, with a maximum time gap of one hundred and twenty days between any two meetings	Regulation 17(2) of SEBI LODR Regulations	The time gap between two board meetings was more than 120 days.	Nil	N.A.	The time gap between two board meetings (i.e. February 27, 2023 and July 12, 2023) was more than 120 days.	Nil	The time gap between two board meetings was more than 120 days.	The Company was unable to hold the meeting of audit committee and board of directors within the statutory timeline for approval of financial results for financial year ended March 31, 2023 due to ongoing medical incapacitation of a key member of audit committee which has resulted this non-compliance.	-
3.	The chairperson of audit committee shall be present at annual general meeting.	Regulation 18(1)(d) of SEBI LODR Regulations	The chairperson of audit committee was not present at AGM.	Nil	N.A.	The chairperson of audit committee was not present at AGM	Nil	The chairperson of audit committee was not present at AGM of the Company held on January 10, 2024	The chairperson of audit committee was not available to attend the AGM of the Company held on January 10, 2024 due to his medical incapacitation.	-
4.	The audit committee	Regulation 18(2)(a) of	The Company has	Nil	N.A.	The Company has conducted	Nil	The Company conducted only	The Company was unable to hold meeting of audit	-



S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	shall meet at least four times a year and not more than one hundred and twenty days shall elapse between two meetings.	SEBI LODR Regulations	conducted only two audit committee meeting during the Review Period i.e. on August 11, 2023 and December 11, 2023.			only two audit committee meeting during the Review Period i.e. on August 11, 2023 and December 11, 2023.		two audit committee meeting during the Review Period and the time gap between the two audit committee meetings were more than 120 days	committee for approval of financial results for financial year ended March 31, 2023 due to ongoing medical incapacitation of a key member of its audit committee and accordingly the no. of audit committee meetings were not held as per minimum prescribed limit.	
5.	The listed entity shall submit to stock exchange disclosure on related party transactions every six months on the date of publication of financial results	Regulation 23(9) of SEBI LODR Regulations	There was delay of one day in submission of disclosure on related party transactions for six months ended September 30, 2023.	BSE Limited	Fine	There was delay of one day in submission of disclosure on related party transactions for six months ended September 30, 2023.	Rs.5,900	There was delay of one day in submission of disclosure on related party transactions for six months ended September 30, 2023.	One day delay in disclosure on related party transactions was on account of technical error in XBRL instance document to be uploaded on BSE Listing Centre. Nevertheless, the XBRL file was sent to BSE on the date of publication of financial results through email. However, the exchange has not considered the same as compliance under the SEBI LODR Regulations.	-
6.	At least one independent director on the board of directors of	Regulation 24(1) of SEBI LODR Regulations	The Company has not appointed one independent	N.A.	Nil	The Company has not appointed one independent director of the	Nil	SpiceXpress and Logistics Private Limited has become material subsidiary	Consequent upon slump sale of cargo business undertaking of the Company to its subsidiary (SpiceXpress and Logistics Private Limited)	-



S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
	the listed entity shall be a director on the board of directors of an unlisted material subsidiary		director of the Company on the board of its unlisted material subsidiary.			Company on the board of unlisted material subsidiary namely SpiceXpress and Logistics Private Limited		(unlisted) of the Company effective April 1, 2023 and the Company is required to appoint one independent director of the Company on the board of SpiceXpress and Logistics Private Limited	effective April 1, 2023, SpiceXpress and Logistics Private Limited has become unlisted material subsidiary. The Company is evaluating the appointment of one independent director of the Company on the board of said unlisted material subsidiary.	
7.	The listed entity shall submit to the stock exchange monitoring agency report within forty-five days from the end of each quarter	Regulation 32 of SEBI LODR Regulations read with Regulation 162A of SEBI ICDR Regulations	The Company has not submitted monitoring agency report for quarters ended December 31, 2023.	N.A.	Nil	The Company has not submitted monitoring agency report for quarters ended December 31, 2023.	Nil	The Company has not submitted monitoring agency report for quarters ended December 31, 2023.	The Company has not conducted meetings of audit committee and board of directors for approving the financial results for quarter ended December 31, 2023 and hence monitoring agency report has not been placed before these meetings and not submitted to stock exchange.	-
8.	The listed entity shall submit (a) quarterly and year to date financial results to stock	Regulation 33 of SEBI LODR Regulations	Delay in submission of financial results with stock exchange	BSE Limited	Fine	The audited financial results for year ended March 31, 2023 was submitted on August 14,	Rs.1,82,900	The audited financial results for year ended March 31, 2023 was submitted on August 14, 2023.	The Company was unable to hold the meeting of audit committee for approval of financial results for financial year ended March 31, 2023 due to ongoing medical incapacitation of a key	-




S. No.	Compliance Requirement (Regulations/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	exchange within forty five days from the end of each quarter and (b) annual audited financial results to stock exchange within sixty days from the end of the financial year.					2023. The un-audited financial results for quarter ended on September 30, 2023 was submitted on December 12, 2023. The un-audited financial results for quarter ended on December 31, 2023 has not been submitted till date.	Rs.1,59,300 Rs.2,77,300 [Amount until April 1, 2024]	The un-audited financial results for quarter ended on September 30, 2023 was submitted on December 12, 2023. The un-audited financial results for quarter ended on December 31, 2023 has not been submitted till date.	member of its audit committee.	BSE has also frozen demat account of promoters of the Company as per SOP issued by SEBI.
9.	If a listed entity does not submit its financial results to stock exchange within prescribed timeline, the listed entity	SEBI Circular dated November 19, 2018 bearing no. CIR/CFD/C MD-1/142/2018	The Company has not disclosed the reasons for delay in submission of financial results for year ended March 31,	BSE Limited	Advisory	The Company has not disclosed the reasons for delay in submission of financial results for year ended March 31, 2023 and	Nil	The Company has not disclosed the reasons for delay in submission of financial results for year ended March 31, 2023 and quarters ended September 30, 2023 and	The Company has received the advisory from exchange and will be cautious of compliance going forward.	



S. No.	Compliance Requirement (Regulations/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
	shall disclose detailed reasons for such delay to the stock exchanges within one working day of the due date of submission for the results.		2023 and quarters ended September 30, 2023 and December 31, 2023.			quarters ended September 30, 2023 and December 31, 2023.		December 31, 2023. BSE Limited has issued advisory to the Company for said non-compliances.		
10.	listed entity shall maintain a structured digital database containing the prescribed details of UPSI.	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation, 2015.	During the Review Period, the Company has not maintained the prescribed database of UPSI.	BSE Limited	Notice of non-compliance	During the Review Period, the Company has not maintained the prescribed database of UPSI.	Nil	During the Review Period, the Company has not maintained the prescribed database of UPSI.	The Company has procured necessary software to maintain the prescribed database in January 2023. However, during the review period, no entry has been maintained in the software.	-



Annexure – B

S. No.	Observations/ remarks of the Practicing Company Secretary in the previous reports and observation made in the secretarial compliance report for the year ended March 31, 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	<p>The composition of the Board of Directors of the Listed Entity is not as per the requirement of the Regulation 17(1) of the SEBI LODR Regulations as the Listed Entity has not appointed one independent woman director and the total number of directors are less than six.</p> <p>The Listed Entity has paid fine as per Standard Operating Procedures issued by SEBI.</p>	Regulation 17(1) of the SEBI LODR Regulations	<p>The Listed Entity has not appointed one independent woman director and the board of directors of the Listed Entity comprises of five directors.</p> <p>The Listed Entity has paid fine of Rs.5,900 per day as per SOP issued by SEBI.</p>	The Company has identified one woman candidature for appointment as independent director and has filed necessary application for security clearance of such candidature on May 15, 2024 as mandated by Civil Aviation Requirements of Ministry of Civil Aviation.	On appointment of said candidature as independent director upon receipt of security clearance, <i>ceteris paribus</i> , the Company will be in compliance of Regulation 17(1) of SEBI LODR Regulations.
2.	<p>The Listed Entity has conducted only three board meetings during a year. Further, time gap between two meetings was more than one hundred and twenty days at once instance.</p> <p>The Listed Entity has filed an application for waiver of fine.</p>	Regulation 17(2) of SEBI LODR Regulations	<p>The Listed Entity has conducted only three board meetings during a year.</p> <p>The Listed Entity has paid fine of Rs.11,800 as per SOP issued by SEBI.</p>	During May 2022, a ransomware attack affected IT system(s) of the Company and access to data and computer systems were blocked. This has resulted in delay in completion of audit process and conducting the board meeting and submission of financial results for quarter and year ended March 31, 2022 and quarter ended June 30, 2022.	Not applicable
3.	<p>The Listed Entity has submitted the annual audited financial results for financial year ended March 31, 2022 to the stock exchange with the delay of ninety-three days.</p> <p>The Listed Entity has filed an application for waiver of fine.</p>	Regulation 33(3)(d) of SEBI LODR Regulations	<p>Delay in submission of annual audited financial results to stock exchange.</p> <p>The Listed Entity has paid fine of Rs.2,71,400 as per SOP issued by SEBI.</p>	The Company took corrective measures with assistance of cyberexperts and authorities and also informed CERT-In (Indian Computer Emergency Response Team) about the ransomware attack	

S. No.	Observations/ remarks of the Practicing Company Secretary in the previous reports and observation made in the secretarial compliance report for the year ended March 31, 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
4.	<p>The Listed Entity has submitted the financial results for quarter ended June 30, 2022 to the stock exchange with the delay of sixteen days.</p> <p>The Listed Entity has filed an application for waiver of fine.</p>	Regulation 33(3)(a) of SEBI LODR Regulations	<p>Delay in submission of financial results to stock exchange.</p> <p>The Listed Entity has paid fine of Rs.88,500 as per SOP issued by SEBI.</p>	<p>to investigate the root causes and to further suggest remedial steps. Basis the corrective measures, the Company was able to retrieve the IT system(s) after the said ransomware attack. The Company has also revalidated the books of accounts in order to detect any possible error as a result of said ransomware attack.</p> <p>These non-compliances were result of ransomware attack on IT system of the Company.</p>	
5.	<p>The Listed Entity has submitted the financial results for quarter ended December 31, 2022 to the stock exchange with the delay of ten days.</p> <p>The Listed Entity has paid fine as per Standard Operating Procedures issued by SEBI.</p>	Regulation 33(3)(a) of SEBI LODR Regulations	<p>Delay in submission of financial results to stock exchange.</p> <p>The Listed Entity has paid fine of Rs.59,000 as per SOP issued by SEBI.</p>	Not applicable	According to the Company, due to some unavoidable circumstances, the quorum for independent directors was not available for the audit committee meeting scheduled on February 14, 2023 (within time limit of Regulation 33(3)(a) of SEBI LODR Regulations) to consider and recommend the financial results for quarter ended December 31, 2022 to the Board for their consideration.
6.	The Listed Entity has conducted only three meetings of the audit committee and time gap between two meetings was more than one hundred and twenty days at one instance.	Regulation 18(2)(a) of SEBI LODR Regulations	The Listed Entity has conducted only three meetings of the audit committee during a year.	Please refer s. no. 2 to 4 above.	Not applicable



S. No.	Observations/ remarks of the Practicing Company Secretary in the previous reports and observation made in the secretarial compliance report for the year ended March 31, 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
7.	During the Review Period, the Listed Entity has not maintained the prescribed database of unpublished price sensitive information.	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation, 2015.	During the Review Period, the Listed Entity has not maintained the prescribed database of unpublished price sensitive information.	The non-compliance was reported to the Board of Directors of the Company and accordingly all designated persons were advised to enter details of unpublished price sensitive information and prescribed database in the necessary software already procured by the Company.	No unpublished price sensitive information entry has been maintained

