

**SADHNA BROADCAST LIMITED**  
**[Formerly known as Chirau Broadcast Network Limited]**

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**CIN: L92100DL1994PLC059093**

**DATE: 31.07.2020**

**To,**

**BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001**

**Metropolitan Stock Exchange Limited  
4th Floor, Vibhgyog Tower, Opposite  
Trident Hotel, Bandra Kurla Complex  
Mumbai-400098**

**Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2020**

Dear Sir,

In compliance with the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMDI/27/2019 dated 8th February, 2019, we hereby submit Annual Secretarial Compliance Report for the Financial Year ended on 31st, March, 2020 issued by V kumar and Associates, Company Secretaries.

Kindly consider and take our submission in your records.

Thanking You

Yours faithfully

**For Sadhna Broadcast Limited**

  
Name: **Tajinder Kaur**  
DIN: **06799570**

Designation: Managing Director

Address: 24/27 Front Side, West Patel Nagar Delhi -110008

Place: New Delhi

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Registered Office: 37, Second Floor, Rani Jhansi Road, Motia Khan, Paharganj, Delhi- 110055

Email ID: [cbnl.delhi@gmail.com](mailto:cbnl.delhi@gmail.com), Website: [www.sadhnabroadcast.com](http://www.sadhnabroadcast.com)

Phone: 91-11-23552627, Fax No.: 91-11-23524610



**V KUMAR AND ASSOCIATES**  
**Company Secretaries**

15/18, Basement, West Patel Nagar, New Delhi-110008

Ph. : +91-11-2588 5492, M. : +91-99102 18035

E-mail : csvivekkumar@gmail.com

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Ref. N o.

Date.....

**Secretarial Compliance Report of Sadhna Broadcast Limited for the year ended 31<sup>st</sup>  
March, 2020**

I Vivek Kumar, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Sadhna Broadcast 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, 2020 in respect of compliance with the provisions of:

- (1) the Securities and Exchange Board of India Act, 1992 ("SEBI ACT") and the Regulations, circulars, guidelines issued there under; and
- (2) the Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI"); including
  - (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;
  - (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) 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;
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

*Vivek Kumar*

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

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

(h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013.

(i) and circular/guidelines issued thereunder;

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 Circular/guidelines issued thereunder, except:-

S.No	Compliance Requirement	Deviations	Remarks of PCS
1.	Regulation 33 of SEBI (LODR) Regulations, 2015	Delay in submission of Financial Result for the Quarter and Year ended 31 <sup>st</sup> March, 2019.	The Company has paid penalty for the same to Stock Exchange via UTR NO. SBIN819172111744 to MSEI and UTR No. SBINB819172111507 to BSE dated 21- June-2019
2.	Non-compliance of Reg. 42 of SEBI (LODR) Regulations, 2015	Non- submission of Date of intimation of record date to the Exchange as the Board declared final dividend June 05, 2019	The Company has paid penalty for the same to Stock Exchange via UTR NO. 022231807271 to MSEI dated 07-May-2020.

(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 examination of those records.

(c) The following are the details of actions taken against the listed entity 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:

S.No	Action taken by	Details of Violation	Details of action taken	Remarks of PCS
1.	Bombay Stock Exchange (BSE) and Metropolitan Stock Exchange Of India Limited	Delay in submission of Financial Result for the Quarter and Year ended 31 <sup>st</sup> March, 2019.	Penalty of Rs. 43200/- and Rs. 35400 was imposed by the MSEI (via letter dated 17 <sup>th</sup> June, 2019) & BSE	The Company has already paid penalty for the same to Stock Exchange via UTR NO. SBIN819172111744 to MSEI and UTR No. SBINB819172111507 to BSE dated 21- June-2019
2.	Metropolitan	Non-compliance of Reg. 42	Penalty of Rs.	The Company has

*Ujjwal Kumar*

	Stock Exchange Of India Limited	of SEBI (LODR) Regulations, 2015	11,500 was imposed by the MSEI via letter dated 15 <sup>th</sup> April, 2020	already paid penalty for the same to Stock Exchange via UTR NO. <u>022231807271</u> to MSEI dated 07-May-2020
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports: NA

**Date: 31.07.2020**

**Place: New Delhi**

**UDIN: F008976B000542399**

**For V. Kumar & Associates  
Companies Secretaries**



**(CS Vivek Kumar)**

**Prop.**

**Membership No.: FCS8976 CP No: 10438**