

A2Z INFRA ENGINEERING LTD.

CIN NO. L74999HR2002PLC034805



REF. No.:- A2ZINFRA/SE/2021-22/12

BY E-FILING

June 24, 2021

To,
BSE Limited
Phiroze Jeejeebhoy Towers
Rotuda Building, Dalal Street,
Mumbai-400 001

To,
National Stock Exchange of India Limited
Listing Department
Exchange Plaza, 5th Floor
Plot No. C/1 G Block, BandraKurla Complex,
Bandra (E), Mumbai-400051

Fax-022-22722039
BSE Code- 533292

Fax- 022-26598237/38
NSE Code- A2ZINFRA

Dear Sir,

Sub: - Secretarial Compliance Report for financial year ended March 31, 2021

Please find enclosed the Secretarial Compliance Report of the Company for the financial year ended March 31, 2021, pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the above information in your records.

Thanking you,
Yours Truly

For A2Z INFRA ENGINEERING LTD.


Atul Kumar Agarwal
Company Secretary
FCS-6453



Add: - Plot No. B-38, Institutional Area,
Sector-32, Gurgaon-122001, Haryana



Secretarial compliance report of A2Z Infra Engineering Limited for the financial year ended 31st March 2021

We, DR Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by A2Z Infra Engineering 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 31st March 2021 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;
- (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 financial year under review*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *Not Applicable to the Company during the financial year under review*
- (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 financial year under review*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;





and based on the above examination, we hereby report that, during the year under review:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued 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.	Delay in approval of Quarterly Financial Results under Regulation 33 of SEBI (LODR) for the quarter ended 30/06/2020 and consequential late submission and publication thereon; Due date- 15 th September 2020	Quarterly Financial Results submitted on 28 th September 2020 instead of 15 th September 2020	Fine levied by National Stock Exchange of India Ltd. (NSE) & BSE Limited (BSE) as per SEBI Circular no. SEBI/ HO/ CFD/CMD/CIR/P/ 2020/12 dt. 22 nd January 2020, which was paid by the Company.

- (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:

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.	NSE	Late filing of financial results under Regulation 33 of SEBI (LODR) for the Quarter ended 30/06/2020	Fine levied by NSE amounting to INR 65,000 + GST	Fine levied by NSE & BSE as per SEBI Circular no. SEBI/ HO/ CFD/CMD/CIR/P/ 2020/12 dt. 22 nd January 2020, which was paid by the Company.
2.	BSE	Late filing of financial results Under Regulation 33 of SEBI (LODR) for the Quarter ended 30/06/2020	Fine levied by BSE amounting to INR 65,000 + GST	





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

Sr. No	Observation of the Practicing Company Secretary in the previous reports	Observation made in the secretarial compliance report for the year ended 31 st March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Delay in approval of quarterly Financial Results under Regulation 33 of SEBI (LODR) for the quarter ended 31/12/2019 and consequential late submission and publication thereon	In the Secretarial Compliance Report for the financial year ended on 31 st March 2020, there is only one observation pertaining to delay in approval of quarterly Financial Results under Regulation 33 of SEBI (LODR) for the quarter ended 31/12/2019 and consequential late submission and publication thereon.	The Company has already paid the fine in respect of the default pertaining to late submission of financial results for the quarter ended 31 st December 2019 in response to the letter received from BSE & NSE.	The Company has already paid the fine in respect of the default pertaining to late submission of financial results for the quarter ended 31 st December 2019 in response to the letter received from BSE & NSE.

For DR Associates
Company Secretaries
Firm Regn. No.: P2007DE003300




Suchitta Koley
Partner
CP No.: 714

UDIN: F001647C000501883

Place: New Delhi
Date: 23rd June 2021