

Date: 30.05.2024

To,
The Manager
Department of Corporate Services
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai-400 001

To,
The Asst. Vice President
National Stock Exchange of India Ltd
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051

Dear Sir,

Sub: Submission of Secretarial Compliance Report.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report for the year ended on 31st March, 2024.

This is for your information and record.

**Yours faithfully,
For Tantia Constructions Limited**

**(Ayanti Sen)
Company Secretary-and-Compliance Officer**



Encl: a/a



Registered & Corporate Office

DD-30, Sector-1, Salt Lake City, Kolkata - 700 064, India
Tel : +91 33 4019 0000
Fax : +91 33 4019 0001
E-mail : info@tantiagroup.com

Delhi Office

5th Floor, Unit No. 517 & 518
Le-Meridian Commercial Complex,
Raisina Road, New Delhi - 110 001
Tel : +91 114058 1302
E-mail : delhi@tantiagroup.com

CIN - L74210WB1964PLC026284

C r e a t i n g C o r e I n f r a s t r u c t u r e



MR & Associates

COMPANY SECRETARIES

46, B. B. Ganguly Street, 406, Kolkata - 700 012

Tel No: 033 2237 9517 / 4007 7907

Email : mrosso1996@gmail.com / goenkamohan@gmail.com

**SECRETARIAL COMPLIANCE REPORT
OF
TANTIA CONSTRUCTIONS LTD
FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2024**

[Pursuant to Regulation 24A(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended]

**TO,
THE MEMBERS,
TANTIA CONSTRUCTIONS LTD.
BLOCK DD 30 SECTOR 1 SALT LAKE CITY
7TH FLOOR KOLKATA – 700064
WEST BENGAL**

We, MR & Associates, a firm of Practicing Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **TANTIA CONSTRUCTIONS LTD.** (hereinafter called the company). Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, partially complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, MR & Associates, a firm of Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by M/s. **TANTIA CONSTRUCTIONS LTD.** ("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 on 31st March, 2024 ("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”);

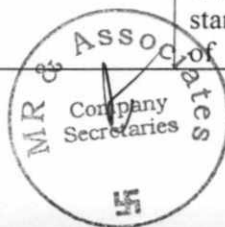
The specific Regulations, whose provisions and the circulars / guidelines issued thereunder, have been examined, include: -

- (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; -
- (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 as there were no reportable events during the Financial Year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **-Not Applicable as there were no reportable events during the Financial Year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **-Not Applicable as there were no reportable events during the Financial Year under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **- Not Applicable as there was no reportable event during the Financial Year under review.**

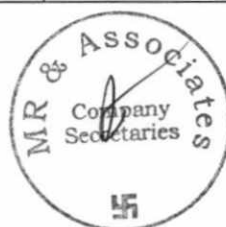
and circulars/ guidelines issued thereunder,

We hereby report that, during the Review Period, Hon'ble NCLT, Kolkata Bench has approved the resolution plan vide order dated 24th February, 2020 read with order dated May 01, 2023 read with corrigendum order dated May 18, 2023 pursuant to which the Monitoring Committee at its meeting dated 17.06.2023 has cancelled 99,19,032 equity shares held physically by the erstwhile promoter/promoter group and based on the above examination, We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks of the Practicing Company Secretary
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by	No	The Company is generally compliant with the compliance of Secretarial standards after the approval of resolution Plan vide



	the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.		National Company Law Tribunal, Kolkata bench order dated 1 st May 2023, read with corrigendum order dated May 18, 2023 i.e. new board formation.
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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	Yes No	All the policies are not updated in conformity with SEBI Regulations.
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) are accurate and specific which redirects to the relevant document(s)/ section of the website. 	Yes Yes No	The Company is generally compliant with the timeliness of dissemination of information. The company's web address is given in the website affirmation in the annual corporate governance report under Regulation 27(2) for the F.Y 22-23 submitted during the year under review.
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	
5.	To examine details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries.	N/A Yes	The Company does not have any material subsidiary.



6.	<p>Preservation of Documents:</p> <p>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, 2015.</p>	Yes	
7.	<p>Performance Evaluation:</p> <p>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.</p>	Yes	The Power of the Board of Director after the commencement of CIR process stood suspended. The new Board formed after 17.06.2023 pursuant to the NCLT order, so the performance evaluation was conducted in the BOD meeting dated 2nd February, 2024.
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p>	N/A	The Company has constituted the Audit Committee as per terms of resolution plan approved by NCLT order dated 01.05.2023 read with corrigendum order dated 18.05.2023.
9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	As per the information provided by the management all the material information u/r 30 were intimated to the stock exchange within the specified time period.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	The company was not in compliance with the maintenance of SDD for the quarter ended June, 2023 as it was under implementation stage of resolution plan. The Company is now maintaining database internally w.e.f. last week of June 2023 to comply with the requirements of SDD under PIT Regulations.



11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	Yes	As stated in "Annexure-A" and "Annexure-B"
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 LODR Regulations by listed entities.	N/A	There was no such instances of resignation of auditor during the Financial Year 2023-24. <i>However, The listed entity has not complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has not modified the terms of appointment of its statutory auditors.</i>
13.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	As stated in "Annexure-A" and "Annexure-B"

I (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, subject to the following observations as specified below in addition to the above-mentioned points: -

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Detail of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As per Annexure A										



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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
As per Annexure B						

Assumptions & 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. We 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 (Listing Obligations and Disclosure Requirements) Regulations, 2015 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 MR & Associates
Company Secretaries
A Peer Reviewed Firm

Peer Review Certificate No.: 5598/2024

Place : Kolkata
Date : 30.05.2024



[Handwritten Signature]

[M. R. Goenka]
Partner
FCS No.: 4515
C P No.: 2551

UDIN: F004515F000495830

Annexure- A

I. (a)The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, subject to the following observations as specified below in addition to the other mentioned points in the report: -

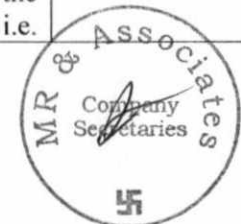
Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The listed company shall ensure compliance pertaining to - The composition of the Board and appointment of Woman Director - The no. of Board meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and remuneration committee - The constitution of Stakeholders Relationship Committee.	Regulation 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A), of SEBI (LODR) Regulation, 2015	Non-compliance for the part of Audit period till the implementation of Resolution Plan vide Hon' NCLT order dated 01.05.2023 r/w corrigendum Order 18.05.2023	BSE Limited	Imposition of Fine vide Email dated 22.05.2023 for quarter ended March 2023	Non-compliance with requirements pertaining to Composition of board and appointment of Women Director, No. and quorum of board meetings, Constitution of Audit, Stakeholders relationship, Nomination and remuneration Committee	11,80,000/-	The Company has been Non-Compliant for the part of Audit period till the implementation of Resolution Plan vide Hon' NCLT order dated 01.05.2023 r/w corrigendum Order 18.05.2023	As per the approved resolution plan all fines prior to the effective date i.e. 18.05.2023 which has occurred or become due has been waived off. The company has complied with the applicable regulations within the time period as per the terms of resolution plan and the NCLT order dated 01.05.2023 read with corrigendum order dated 18.05.2023.	The said fine has been waived off by the BSE vide letter dated 28.02.2024



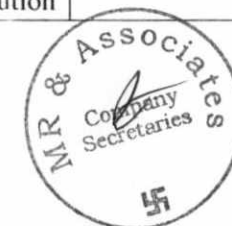
2	<p>The listed company shall ensure compliance pertaining to</p> <ul style="list-style-type: none"> - The composition of the Board and appointment of Woman Director - The no. of Board meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and remuneration committee - The constitution of Stakeholders Relationship Committee. 	Regulation 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A), of SEBI (LODR) Regulation, 2015	Same as above point 1	BSE Limited	Imposition of Fine vide Email dated 21.08.2023 For Quarter ended June 2023	Non-compliance with requirements pertaining to Composition of board and appointment of Women Director, No. and quorum of board meetings, Constitution of Audit, Stakeholders relationship, Nomination and remuneration Committee	11,92,980/-	Same as above point 1	Same as above point 1	-
3.	<p>The listed company shall ensure compliance pertaining to</p> <ul style="list-style-type: none"> - The composition of the Board and appointment of Woman Director - The no. of Board 	Regulation 17(1), 17(2A), 18(1), 19(1)/19(2), 20(2)/(2A), of SEBI (LODR) Regulation	Same as above point 1	BSE Limited	Imposition of Fine vide Email dated 21.11.2023 For Quarter ended	Non-compliance with requirements pertaining to Composition of board and appointment of Women Director, No. and quorum of board meetings,	10,33,680/-	The Company in its board meeting dated 17.06.2023 and 15.09.2023 has appointed the requisite independent director	As per the Clause 14.1 of the approved Resolution Plan, the Resolution Applicant will appoint the Executive/Non-Executive directors as per	-



	meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and remuneration committee - The constitution of Stakeholders Relationship Committee.	on,2015			September 2023	Constitution of Audit, Stakeholders relationship, Nomination and remuneration, Management committee		and has also constituted the requisite committee as per the required regulations	the statutory requirements within 120 days of the Effective date of the Resolution Plan, i.e. 18 th May, 2023. Which meant that the Company had time till 17 th September 2023 to comply with the mentioned Non-compliant regulations. Hence the Company been compliant with the Regulation 17(1), 17(2), 18(1), 19(1)/19(2),20(2)/(2A), of SEBI (LODR) Regulation,2015 within the time period provided by the Resolution Plan.	
4.	The listed company shall ensure compliance pertaining to	Regulation 17(1), 17(2), 18(1), 19(1)/19(Same as Point I above	NSE limited	Imposition of Fine vide NSE Notice NSE/SOP	Non-compliance with requirements pertaining to Composition of	11,80,000/-	The Company has been Non-Compliant for the part of Audit	As per the approved resolution plan all fines prior to the effective date i.e.	-



	<ul style="list-style-type: none"> - The composition of the Board and appointment of Woman Director - The no. of Board meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and remuneration committee - The constitution of Stakeholders Relationship Committee. 	2),20(2)/(2A), of SEBI (LODR) Regulation, 2015			/RBF/0609 dated 07.06.2023 for Quarter ended March 2023	board and appointment of Women Director, No. and quorum of board meetings, Constitution of Audit, Stakeholders relationship, Nomination and remuneration, Management committee		period till the implementation of Resolution Plan vide Hon' NCLT order dated 01.05.2023 r/w corrigendum Order 18.05.2023	18.05.2023 which has occurred or become due has been waived off. The company has complied with the applicable regulations within the time period as per the terms of resolution plan and the NCLT order dated 01.05.2023 read with corrigendum order dated 18.05.2023	
5.	<p>The listed company shall ensure compliance pertaining to</p> <ul style="list-style-type: none"> - The composition of the Board and appointment of Woman Director - The no. of Board meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and 	Regulation 17(1), 17(2), 18(1), 19(1)/19(2),20(2)/(2A), of SEBI (LODR) Regulation, 2015	Same as Point 1 above	NSE limited	Imposition of Fine vide NSE Notice NSE/SOP /RBF/0928 dated 06.09.2023 for Quarter ended June 2023	Non-compliance with requirements pertaining to Composition of board and appointment of Women Director, No. and quorum of board meetings, Constitution of Audit, Stakeholders relationship, Nomination and remuneration,	11,92,980/-	The Company has been Non-Compliant for the part of Audit period till the implementation of Resolution Plan vide Hon' NCLT order dated 01.05.2023 r/w corrigendum Order 18.05.2023	As per the Clause 14.1 of the approved Resolution Plan, the Resolution Applicant will appoint the Executive/Non-Executive directors as per the statutory requirements within 120 days of the Effective date of the Resolution	-



	remuneration committee - The constitution of Stakeholders Relationship Committee.					Management committee			Plan, i.e. 18 th May, 2023. Which meant that the Company had time till 17 th September 2023 to comply with the mentioned Non-compliant regulations. Hence the Company been compliant with the Regulation 17(1), 17(2), 18(1), 19(1)/19(2),20(2)/(2A), of SEBI (LODR) Regulation,2015 within the time period provided by the Resolution Plan.	
6.	The listed company shall ensure compliance pertaining to - The composition of the Board and appointment of Woman Director - The no. of Board	Regulation 17(1), 17(2A), 18(1), 19, 20 of SEBI (LODR) Regulation, 2015	Same as Point 1 above	NSE limited	Imposition of Fine vide NSE Notice NSE/LIST-SOP/COMB/FINES/1204 dated 21.11.202	Non-compliance with requirements pertaining to Composition of board and appointment of Women Director, No. and quorum of board meetings,	10,33,680/-	The Company in its board meeting dated 17.06.2023 and 15.09.2023 has appointed the requisite directors/independent director	As per the Clause 14.1 of the approved Resolution Plan, the Resolution Applicant will appoint the Executive/Non-Executive directors as per the statutory	-



	meetings and quorum - The constitution of Audit Committee - The constitution of Nomination and remuneration committee - The constitution of Stakeholders Relationship Committee.				3 for Quarter ended September 2023	Constitution of Audit, Stakeholders relationship, Nomination and remuneration, Management committee		and has also constituted the requisite committee as per the required regulations	requirements within 120 days of the Effective date of the Resolution Plan, i.e. 18 th May, 2023. Which meant that the Company had time till 17 th September 2023 to comply with the mentioned Non-compliant regulations. Hence the Company been compliant with the Regulation 17(1), 17(2), 18(1), 19(1)/19(2),20(2)/(2A), of SEBI (LODR) Regulation,2015 within the time period provided by the Resolution Plan.	
7.	Provisions pertaining to Disclosure of encumbered shares	Reg-31(4) of SEBI (SAST) Regulations, 2011	Non-compliance of the said provision	-	-	Non submission of the details of encumbered shares of the promoters as per the provisions of the Regulations	-	The company is non-compliant with respect to Reg. 31(4) of SEBI (SAST)	The Company has received approval for resolution plan dated 1 st May 2023 read with Corrigendum	-



						for the year ended 31.03.2023		Regulations, 2011 during the period under review.	order dated 18 th May 2023 and as per the terms of the resolution plan the company has transferred its shares to new promoters and hence Disclosure for period ended 2023 is not received since the Board was suspended as on 31 st March, 2023 and promoters of the company were the erstwhile promoters.	
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Annexure- B


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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	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	Delayed compliance of Reg. 24A of SEBI (LODR) Regulations, 2015.	2022-23	Every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year	The company has not submitted the Annual Secretarial Compliance Report within the stipulated time period mentioned in Reg. 24A of SEBI (LODR) Regulations, 2015, for the financial year 2021-22.	Delayed compliance was due to delay in finalization of Accounts. The Company has duly complied with the said regulation for the financial year ended 2023-2024.	The Company has duly complied with the said regulation for the financial year ended 2023-2024.
2	The Company has submitted with delay the Related Party Transactions as per Reg. 23(9) of SEBI (LODR)	2021-22 and 2022-23	The listed entity shall submit to the stock exchanges disclosures of related party transactions. The listed entity shall make such	The Company has delayed in submitting the Related Party Transactions as per Reg. 23(9) of SEBI (LODR) Regulations, 2015 for the quarter	Delayed compliance was due to delay in finalization of Accounts. The Company has duly complied with the said regulation for the financial year ended	The Company has duly complied with the said regulation for the half year ended Sept 2022, March 2023 and Sept 2023 as per the amended Clause of the said regulation.



	Regulations, 2015 for the quarter ended March 2022		disclosures every six months within fifteen days from the date of publication of its standalone and consolidated financial results	ended March 2022.	2023-2024.	
3	The company is non-compliant with respect to Reg 31(4) of SEBI (SAST) Regulations, 2011 during the period under review.	2022-23	The promoter shall declare on yearly basis that he along with persons acting in concert has not made any encumbrance other than those already disclosed during the year.	Non submission of the details of encumbered shares of the promoters as per the provisions of the Regulations for the year ended 31.03.2022	Since, no declaration was received from the promoters, so the required disclosure was not submitted to the stock exchange	This is a continuing default as the Company has received approval for resolution plan dated 1st May 2023 read with Corrigendum order dated 18th May 2023 and as per the terms of the resolution plan the company has transferred its shares to new promoters and hence disclosure for period ended 2023 is not received since the Board was suspended as on 31st March, 2023 and promoters of the company were the erstwhile promoters.
4	The company is noncompliant with respect to Reg 17 and 18 of SEBI (LODR) Reg, 2015 during the period under review.	2022-23	The listed company shall ensure the constitution and relevant compliances of the Board including appoint of a woman director and constitution of Audit Committee.	1. The Company does not have Woman Director on the Board 2. The Company does not have Audit Committee	The Company was under Corporate Insolvency Resolution Process vide Hon'ble National Company Law Tribunal, Kolkata Bench order dated March 13, 2019, in terms of the provisions of Insolvency and Bankruptcy Code, 2016 (IBC) and the regulations framed	This is not a continuing default as pursuant to the NCLT Order dated 1 st May 2023 read with corrigendum order dated 18 th May, 2023 the Monitoring committee has reconstituted the Board and applicable committee in its meeting dated 17.06.2023 and 15.09.2023 and has complied with the said regulation.

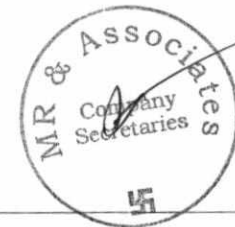


					<p>thereunder.</p> <p>This is not a continuing default as pursuant to the NCLT Order dated 1st May 2023 read with corrigendum order dated 18th May, 2023 the Monitoring committee has reconstituted the Board and applicable committee in its meeting dated 17.06.2023 and 15.09.2023 and has complied with the said regulation.</p>	
5	The Company is non-compliant with respect to the said provisions during the period under review.	2021-22 and 2022-23	<p>Provisions pertaining to</p> <ul style="list-style-type: none"> - the composition of the Board and woman director, - The no. of Board meetings. - the constitution of Audit Committee - the constitution of Nomination and remuneration committee 	<p>Non-compliance with requirements pertaining to – the composition of the Board including failure to appoint woman director,</p> <ul style="list-style-type: none"> - The no. of Board meetings. -the constitution of Audit Committee -the constitution of Nomination and 	Same as pt. 4 above	<p>Same as pt. 4 above</p> 

			<p>- the constitution of Stakeholders Relationship Committee u/s Reg 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A) of SEBI (LODR) Reg, 2015</p>	<p>remuneration committee -the constitution of Stakeholders Relationship Committee. -for the quarter ended 30.09.2022 under Reg 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A) of SEBI (LODR) Reg, 2015.</p> <p>BSE Limited imposed Fine vide notice dated 21.11.2022 of an amount of 40,35,600/-</p>		
6	<p>The Company is non-compliant with respect to the said provisions during the period under review.</p>	<p>2021-22 and 2022-23</p>	<p>Provisions pertaining to</p> <ul style="list-style-type: none"> - the composition of the Board and woman director, - The no. of Board meetings. - the constitution of Audit Committee - the constitution of Nomination and remuneration committee - the constitution of Stakeholders 	<p>Non-compliance with requirements pertaining to – the composition of the Board including failure to appoint woman director,</p> <ul style="list-style-type: none"> - The no. of Board meetings. -the constitution of Audit Committee -the constitution of Nomination and remuneration committee 	<p>Same as pt. 4 above</p>	<p>Same as pt. 4 above</p>



			Relationship Committee u/s Reg 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A) of SEBI (LODR) Reg, 2015	-the constitution of Stakeholders Relationship Committee. -for the quarter ended 30.09.2022 under Reg 17(1), 17(2), 18(1), 19(1)/19(2), 20(2)/(2A) of SEBI (LODR) Reg. 2015. National Stock Exchange Limited vide notice dated 21.02.2023 of an amount of 12,05,960/-		
7	Company was admitted to CIRP Process vide Hon'ble NCLT Order Dated 13 March, 2019, the SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019 was not applicable to the Company.	2022-23	Specific disclosures are required under the SEBI LODR Regulations in certain matters such as delay /default in payment of interest /principal on debt securities, including listed Non-Convertible	Non-submission of disclosures made under SEBI Circular CIR/CFD/CMD/93/2017 dated August 4, 2017 regarding default of loans, declaration of fraudulent account, etc.	Since the said provisions was not applicable to the Company due to its admission into CIRP Process	Company was admitted to CIRP Process vide Hon'ble NCLT Order Dated 13 March, 2019, the SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019 was not applicable to the Company.



			Debentures, listed Non-Convertible Redeemable Preference Shares, Foreign Currency Convertible Bonds (FCCBs) etc.			
8	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015.	2018-19, 2020-21, 2021-22 and 2022-23	The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015. BSE Limited imposed Fine vide notice dated 15.07.2022 of an amount of Rs. 2,71,400/-	Delayed compliance was due to delay in finalization of Accounts. The Company has duly complied with the said regulation for the financial year ended 2023-2024.	The Company has duly complied with the said regulation for the financial year ended 2023-2024.
9	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations,	2018-19, 2020-21, 2021-22 and 2022-23	The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) National Stock Exchange Limited imposed Fine vide	Delayed compliance was due to delay in finalization of Accounts. The Company has duly complied with the said regulation for the financial year ended 2023-2024.	The Company has duly complied with the said regulation for the financial year ended 2023-2024.



	2015 of March 2022 and quarterly financial results for June 2022, September 2022 and December 2022 quarter of the F.Y 2022-23.		within forty-five days of end of each quarter, other than the last quarter	notice dated 14.09.2022 of an amount of Rs. 1,71,100/-		
10	The Company is not closing the trading window as specified in the Clause 4(2) of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 during the specified period.	2019-20 and 2021-22, 2022-2023	Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.	The Company is not closing the trading window specified in the said regulation of SEBI (Prohibition of Insider Trading) Regulations, 2015 during the specified period.	Since the Financial Results was not adopted within the due date, the disclosure for closure of trading window is not given separately, but the trading window was closed as per PIT Regulations. This is not a continuing default in the financial year 2023-2024	The Company has duly complied with the said regulation for the financial year ended 2023-2024.
11	No corrective actions taken by the company during the period under review.	2020-21, 2021-22 and 2022-2023	The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the	The Listing fee has not been paid by the company to the Stock exchange(s) in which the entity is listed according to	The listing fees for 2020-21, 2021-22 and 2022-2023 was paid in the F.Y. 2023-2024 and the Listing fees for the F.Y. 2024-2025 is	The Company has duly complied with the said regulation for the financial year ended 2023-2024.



			manner specified by the Board or the recognised stock exchange(s) as per Regulation 14 of the SEBI (LODR) Regulations, 2015.	the Regulation 14 of the SEBI (LODR) Regulations, 2015.	paid on 03-05-2024. Hence there is no dues to the stock exchanges as on the date of the report.	
12	No system of compliance was maintained for the structured digital database.	2021-22 and 2022-2023	The board of directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained as per Clause 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Non-compliance of Clause 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015	With the MC overseeing the day-to-day operations of the Company and the financial data is being shared with various consultants, lawyers, creditors, resolution applicant, etc., hence, the Company was not in a position to comply with the requirements of SDD under PIT Regulations. The Company is now maintaining database internally w.e.f. last week of June 2023 to comply with the requirements of SDD under PIT Regulations	The company was not in compliance with the maintenance of SDD for the quarter ended June, 2023 as it was under implementation stage of resolution plan. The Company is now maintaining database internally w.e.f. last week of June 2023 to comply with the requirements of SDD under PIT Regulations.
13	No system of compliance maintained for the structured digital database.	2021-22 and 2022-2023	Pursuant to Reg. 34 of SEBI (LODR) Regulations, 2015 a copy of the annual report shall be sent to the shareholders along with the	Delayed compliance of the Reg. 34 of SEBI (LODR) Regulations, 2015	The company has not submitted the Annual Report within the stipulated time period for the financial year 2020-21. However, this is not a continuing	The Company has duly complied with the said regulation for the financial year ended 2023-2024.



			notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders		default in the financial year 2023-2024.	
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