

NEWTIME INFRASTRUCTURE LIMITED

CIN No.: L24239HR1984PLC040797

Regd. Off.: Lotus Green City, Sector 23 & 24 Bhiwadi, Alwar Bypass, 75 Mtr. Road, Daruhera, Rewari-123401

Phone: 91-7419885077, Email: newtimeinfra2010@gmail.com

Website: www.newtimeinfra.in

Ref. No. : NIL/BSE/ 2020

Date: 31st July, 2020

To,

THE BSE LIMITED,
PHIROZEE JEEJEE BHOY TOWERS,
DALAL STREET,
MUMBAI-400001

BSE SECURITY CODE : 531959

Subject : Annual Secretarial Compliance Report for the year ended 31st March, 2020.

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements Regulations, 2015, as amended, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019. Please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the Financial Year ended **March 31, 2020.**

Thanking You,

Yours Faithfully,
For **NEWTIME INFRASTRUCTURE LIMITED**

Sd/-
Ashish Pandit
Director
DIN: 00139001

Enclosed: As Stated

S. Khurana & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF NEWTIME INFRASTRUCTURE LIMITED For the year ended 31st March, 2020

Entity Name : Newtime Infrastructure Limited
CIN : L24239HR1984PLC040797
Registered Address : Lotus Green City Sector – 23 & 24, Bhiwadi Alwar Bypass,
75 Mtr. Road, Dharuhera, Rewari, Haryana - 123401

I, Sachin Khurana, Practicing Company Secretary of S. Khurana and Associates have examined that:

- All the documents and records made available to us and explanation provided by **NEWTIME INFRASTRUCTURE LIMITED** (“the listed entity”),
- 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 certification,

For the year ended 31st March, 2020 (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Company has not issued any type of Security during the reporting period.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable as the Company has not bought back any of its Securities.**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Company has not issued any debt security during the reporting period.**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable.**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (other regulations as applicable) and circulars/ guidelines issued thereunder;



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I, **Sachin Khurana**, 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: -

S. No.	Compliance Requirement (Regulations! circulars! guidelines including specific clause)	Deviations	Action Taken	Observations! Remarks of the Practicing Company Secretary
1.	Regulation 13: Fees and Other Charges to be paid to the Stock Exchange	Payment of Annual Listing Fees (ALF is pending as on even date).	Suspended on Stock Exchange	The Annual Listing Fees (ALF) has not been paid by the company
2.	Regulation 6 (1): Appointment of Company Secretary	The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Till date Company has not appointed the Whole - Time Company Secretary.
3.	Regulation 31: Shareholding Pattern for the Quarter Ended March 2019	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Filed with delay of 8 days
4.	Regulation 40(9)- Compliance Certificate for the Half Year Ended March 2019	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	File with delay of 6 days



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5.	Regulation 31: Shareholding Pattern for the Quarter Ended June 2019	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Filed with delay of 2 days
6.	Regulation 7(3): Half Year Ended September 2019 Compliance Certificate Maintaining Physical or Electronic Transfer Facility	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Filed with delay of 4 days
7.	Regulation 31: Shareholding Pattern for the Quarter Ended September 2019	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Filed with delay of 9 days
8.	Regulation 33: Financial Results Quarter Ended September 2019	Delayed Submission	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received	Filed with delay of 1 day

***Company has delayed the payment of Annual Listing Fee along with the arrear in interest because of which the Stock Exchange has suspended the listed entity and company was not receiving penalty notices for various non-compliances.**

***Company has regularly defaulted in complying with Regulation 6 of SEBI (LODR) Regulations, 2015 with respect to appointment of Company Secretary as Compliance Officer.**

(b) The listed entity has generally maintained records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.



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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:

S. 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	Stock Exchange	Regulation 14-Fees and other charges- Failure to pay the arrears of Annual Listing Fees	Fees Not paid	Company has been suspended on BSE for trading in securities further resulting in freezing of demat account of promoters and promoters' group

*The Listed Entity has regularly defaulted in complying with the requirement of Regulation 6 of SEBI (LODR) Regulation, 2015 with respect to the appointment of Company Secretary.

*The Listed Entity has also defaulted in payment of Annual Listing Fee on time because of which the listed entity is suspended from BSE.

*As informed by the Listed Entity has been suspended on Stock Exchange for long due to which, no penalty notice for the non-compliances were received

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

Sr. No	Compliance Requirement (Regulations/Circulars/guideline including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Compliance Certificate issued by a Practicing Company Secretary pursuant to Regulation 40(9) & 40(10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the Half Year ended 31 st March, 2019	Delayed Submission	Compliance Certificate was submitted on 06 th May, 2019 with a delay of 06 th (Six) days.
2.	Regulation 31: Shareholding Pattern for Quarter ended 31 st March, 2019	Delayed Submission	Shareholding Pattern were submitted on April 30, 2019 with a delay of 9(Nine) days.
3.	Regulation 31: Shareholding Pattern for Quarter ended 31 st December, 2018	Delayed Submission	Shareholding Pattern were submitted on April 30, 2019 with a delay of 99(Ninety-Nine) days.



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4.	Regulation 33(3)(a): Financial Result for Quarter & year ended 31 st March, 2018	Delayed Submission	The Audited financial results were submitted on June 12, 2018 with a delay of 12 (Twelve) days.
5.	Regulation 6(1) of the SEBI (LODR), Regulation 2015: Appointment of Company Secretary as Compliance Officer	The Company has not appointed the Company Secretary as the Compliance Officer	Till date Company has not appointed.
6.	Regulation 17: Composition of Board of Director	Appointment of Managing Director/Whole time Director	Till date Company has not appointed
7.	Regulation 14: Fees and Other Charges to be paid to the Stock Exchange for the financial year 2018-19,2017-18, 2016-17	Annual Listing Fees has been paid after the expiry of due date.	The Annual Listing Fees (ALF) has been paid to stock exchange after the expiry of due date.

For S. Khurana & Associates
Company Secretaries
FRN: I2014DE1158200
Peer Review No. 804/2020

Sachin Khurana
Proprietor
M. No.: F10098; CP No.: 15212
UDIN - F010098B000541200



Date: 31/07/2020
Place: New Delhi