

NEWTIME INFRASTRUCTURE LIMITED

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

CIN No.: L24239HR1984PLC040797

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

Website: www.newtimeinfra.in

Ref No.: NIL/BSE/10/2022-23

Date: 30/05/2022

To,
The Manager BSE Limited,
Corporate Relationship Department
Phirozee Jeejee Bhoy Towers,
Dalal Street, Mumbai-400001

BSE SECURITY CODE: 531959

Reference: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2022

Dear Sir(s),

Please find the enclosed herewith Annual Secretarial Compliance Report of the Company pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued by **M/s S. Khurana & Associates, Practicing Company Secretaries**, for the Financial Year ended March 31, 2022 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

We request you to take the above on your record.

Thanking You

Yours Faithfully,
For **Newtime Infrastructure Limited**

ASHISH Digitally signed
by ASHISH
PANDIT
PANDIT Date: 2022.05.30
16:59:03 +05'30'

Ashish Pandit
(Director)
DIN: 00139001
Address: Lotus Green City Sector 23 & 24,
Bhiwadi Alwar Bypass 75 MTR
Road Dharuhera Rewari HR 123401

S. Khurana & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF NEWTIME INFRASTRUCTURE LIMITED For the year ended March 31, 2022

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:

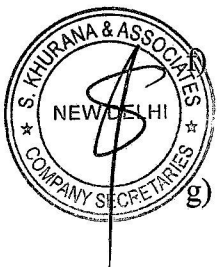
- All the documents and records made available to us and explanation provided by **NEWTIME INFRASTRUCTURE LIMITED** (“the listed entity”),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended March 31, 2022 (“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 (upto August 12, 2021) and Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021 (with effect from August 13, 2021); **Not Applicable as the Company has not granted any options to its employees during the financial year under review.**
- 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 Securities) Regulations, 2021; **Not Applicable.**

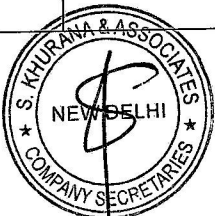


- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
i) (Other regulations as applicable) and circulars/ guidelines issued thereunder;

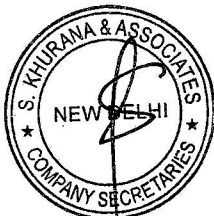
I, **Sachin Khurana**, hereby report that, during the Review Period:

(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 33: Financial Results for the Quarter ended June 2021	Delayed Submission	Company has received an email from stock exchange dated August 21, 2021 to upload the financial results in PDF as well as XBRL format	As confirmed by the listed entity, listed entity is having suspended status on Stock Exchange, no notice has been received for the reported non-compliance.
2.	Regulation 33: Financial Results for the Quarter ended September 2021	Delayed Submission	Company has filed financial results on November 16, 2021	As confirmed by the listed entity, listed entity is having suspended status on Stock Exchange, no notice has been received for the reported non-compliance.
3.	Regulation 23(9): Disclosure of related party transaction on a consolidated basis for every half-year	Disclosure not made	Disclosure for the period April 01, 2021 to September 30, 2021 not found on stock exchange website	As confirmed by the listed entity, listed entity is having suspended status on Stock Exchange, no notice has been received for the reported non-compliance.



4.	Regulation 33(3)(d): Annual Financial Results	Delayed Submission	Company has submitted the financial results on September 01, 2021 as per the exchange time	As confirmed by the listed entity, listed entity is having suspended status on Stock Exchange, no notice has been received for the reported non-compliance.
5.	Regulation 14- Fees and other charges- Failure to pay the arrears of Annual Listing Fees	Default in making timely payment	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 been suspended on BSE for trading in securities further resulting in freezing of demat account of promoters and promoters' group
6.	Regulation 30(2): Disclosure of material events	Delayed Disclosure	Delay in reporting of appointment of Mr. Dheeraj Goel as an Additional Director	Disclosure was required to be made not later than 24 hours from event, however, disclosure was made after 24 hours.
7.	Regulation 30(2): Disclosure of material events	Delayed Disclosure	Delay in reporting of appointment of Atul Sharma as Company Secretary and Compliance Officer.	Disclosure was required to be made not later than 24 hours from event, however, disclosure was made after 24 hours.
8.	Regulation 30(2): Disclosure of material events	Delayed Disclosure	Delay in reporting of Resignation of Mr. Sanjay Tiku as Independent Director.	Disclosure was required to be made not later than 24 hours from event, however, disclosure was made after 24 hours.



10.	Regulation 47: Declaration of Financial Results on Standalone and Consolidated basis	Newspaper publication for Quarter ended June 2021 not made	No Newspaper publication was for the financial results for June 2021 quarter approved in the Board Meeting held on September 15, 2021.	Company has not published the results in the newspaper.
11.	Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018: Compliance Certificate	Delayed Submission	Listed entity has submitted the Compliance Certificate for Quarter ended June 2021 on July 20, 2021	Compliance was required to be made within 15 days
12.	Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018: Compliance Certificate	Delayed Submission	Listed entity has submitted the Compliance Certificate for Quarter ended December 2021 on January 18, 2022.	Compliance was required to be made within 15 days

(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.

(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.
NIL				



**As informed by the Listed Entity, 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:

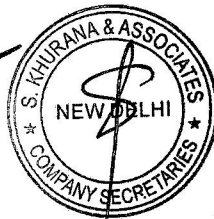
S. No.	Observations of the Practicing Company Secretary for previous Years	Observation made in the Secretarial Compliance Report for the year ended March 31, 2021	Action Initiated	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 14: <i>Fees and other charges to be paid to the recognized Stock Exchange(s)</i>	Annual Listing fees has not been paid by the Company	No action initiated by the Company to comply with the said regulation	Company has not paid the Annual Listing Fee and is suspended from stock exchange.
2.	Regulation 31: <i>Shareholding Pattern for the Quarter Ended March 2020</i>	Delayed filing	Company has filed share holding pattern with a delay of 58 days	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received
3.	Regulation 33(3)(a): <i>Financial Results Quarter Ended December 2020</i>	Delayed filing	Company has filed financial results for quarter ended December 2020 with a delay of one day	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received
4.	Regulation 23(9): <i>Submission of disclosure on Related party transactions Half Year Ended September 2020</i>	Delayed Submission	Filed with a delay of 59 days	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received



5.	Regulation 23(9): Submission of disclosure on Related party transactions Half Year Ended March 2020	Delayed Submission	Filing was not done for half year ended March 2020	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received
6.	Regulation 33(3)(d): Financial Results Year Ended March 2020	Delayed Submission	Filed with a delay of 6 days	As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received
7.	Regulation 14: Fees and other charges to be paid to the recognized Stock Exchange(s)	Default	Company has defaulted in payment of Annual Listing Fee including arrears	Company has been suspended on BSE for trading in securities further resulting in freezing of demat account of promoters and promoters' group

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

Sachin Khurana
Proprietor
M. No.: F10098; CP No.:13212
UDIN - F010098D000433048



Date: 30-05-2022
Place: New Delhi