

June 29, 2021

<b>BSE Limited</b> Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400 001  <b>Company Code No.: 539807</b>	<b>National Stock Exchange of India Limited</b> Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051  <b>Company Symbol: INFIBEAM</b>
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**Sub: Annual Secretarial Compliance Report**

Dear Sir/ Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2021.

We request you to kindly take the same on your records.

Thanking you,

Yours faithfully,

**For Infibeam Avenues Limited**



**Shyamal Trivedi**  
**Vice President & Company Secretary**

**Encl.: As Above**

**INFIBEAM AVENUES LIMITED**

*(Formerly known as Infibeam Incorporation Limited)*

**Regd. Office:** 28<sup>th</sup> Floor, GIFT Two Building, Block No. 56, Road-5C, Zone-5, GIFT CITY, Gandhinagar,  
Taluka & District - Gandhinagar - 382 355, **CIN: L64203GJ2010PLC061366**

**Tel:** +91 79 67772204 | **Fax:** +91 79 67772205 | **Email:** ir@ia.ooo | **Website:** www.ia.ooo

**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**  
**Peer Reviewed Firm**

**SECRETARIAL COMPLIANCE REPORT**  
**OF INFIBEAM AVENUES LIMITED**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

I, Ashish C. Doshi, Partner of SPANJ & ASSOCIATES, Company Secretaries in Practice having office at TF/1, Anison Bldg, 3rd Floor, State Bank of India Lane, Swastik Soc., Nr. Stadium Circle, C. G. Road, Navrangpura, Ahmedabad-380 009 have examined:

- (a) all the documents and records made available to us and explanation provided by the Company, its officers, agents and authorized representatives in electronic form in online system in view of continued situation of COVID 19 pandemic during the conduct of the Audit of **INFIBEAM AVENUES LIMITED** having its registered office at Block No. 56, GIFT Two Building, 28th Floor, Road - 5C, Zone - 5, GIFT CITY, Gandhinagar - 382355, Gujarat, India ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,

for the year ended **31<sup>st</sup> March, 2021** ("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");

*TF/1, Anison Complex, 3<sup>rd</sup> Floor, SBI Lane, Nr. Stadium Circle, C. G. Road, Navrangpura,  
Ahmedabad-380 009 Ph: 079-26421414, 63 52 52 60 32 e-mail: [csdoshiac@gmail.com](mailto:csdoshiac@gmail.com) M : 098250 64740*



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The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder whichever were applicable to the company during the year, 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 (**No events during the year**);
- (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 (**No events during the year**);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**No events during the year**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



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- (i) During the year under review, there were no events which required Compliance with the conditions as mentioned in Para 6(A) & 6 (B) of the SEBI Circular CIR/CFD/CMD1/114/2019, Dated 18th October, 2019

and circulars/ guidelines issued thereunder;

However, it has been observed that there were no events requiring compliance under the regulations covered under para (d), (f) and (g) mentioned hereinabove.

Based on the above examination, We 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 which were applicable to 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:



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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.	SEBI	Impounding Order cum show cause Notice dated August 24, 2020 issued to Infinium Motors (Gujarat) Private Limited one of the promoter Group entity and Show cause notice(s) dated September 28, 2020 issued to Mr. Vishal Mehta and Mr. Malav Mehta – Promoter(s). Under Section 19 read with Sections 11 (1), 11 (4) (d), 11 (4A) and Section 11B of the SEBI Act, 1992 read with Regulation 10 of the SEBI (PIT) Regulations, 2015	The matter is pending before SEBI on the grounds of settlement applications filed by both promoters and a promoter group entity and submission of Bank Guarantee equivalent to impounding amount as per order	We have been informed that settlement applications have been preferred by the promoters Mr. Vishal Mehta, Mr. Malav Mehta and Infinium Motors (Gujarat) Private Limited one of the promoter Group entity to settle proceedings arising out of the show cause notices dated September 28, 2020 and impounding order cum Show cause notice dated August 24, 2020 issued by SEBI against them. The final orders against settlement applications are awaited.





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(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Date: 28<sup>th</sup> June, 2021

Place : Ahmedabad



*Ashish C Doshi*  
ASHISH C DOSHI, PARTNER

SPANJ & ASSOCIATES

Company Secretaries

ACS/FCS No.: F3544

COP No.: 2356

P R Cer No. : 702/2020

UDIN: F003544C000528728