



SANTOSH KUMAR PRADHAN COMPANY SECRETARIES

**Secretarial Compliance Report
Of
Ahluwalia Contracts (India) Limited
(CIN: L45101DL1979PLC009654)
For the Year
Ended 31st March, 2021**

I, Santosh Kumar Pradhan, Company Secretary in Practice, have examined:

- (a) All the documents and records made available to us and explanation provided by **Ahluwalia Contracts (India) Limited (hereinafter referred to as the Listed Entity)**,
- (b) The filling/ submissions made by the Listed Entity to the Stock Exchanges,
- (c) Website of the Listed Entity,
- (d) Any other document/ filling, as may be relevant, which has been relied upon to make
this certification for the Year ended 31st March, 2021 (“Review Period”) in respect of
Compliance of the Provisions of:

- (a) The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulation, 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, as amended;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and participants) Regulation, 2018;

- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulation, 2018:-**Not applicable during the Review period.**
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:-**Not applicable during the Review period.**
- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not applicable during the Review period.**
- (h) Securities and Exchange Board of India (Issued and Listing of Debt Securities Regulation, 2008:- **Not applicable during the Review period.**
- (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulation, 2013:- **Not applicable during the Review period.**

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the review period:

- (a) The Listed Entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (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 my examination of those records.
- (c) There are no actions taken against the Listed Entity/ its promoters/ directors either by SEBI or by Stock Exchanges (including under the standard Operating procedures issued by SEBI though various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

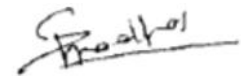
Sr. No.	Observations of the Practicing Company Secretary in the Previous reports	Observations made in the Secretarial Compliance report for the Year ended 31.03.2020 (The Years are	Comments Of the Practicing Company Secretary On The actions taken by the listed entity
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**SANTOSH KUMAR PRADHAN
COMPANY SECRETARIES**

		to be mentioned)	
1.	The Listed entity did not have 2/3 rd member of the Audit Committee as Independent Director as required under Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Listed entity did not have 2/3 rd member of the Audit Committee as Independent Director.	On the appointment of Mr. R.P. Gupta, as Independent Director and as a member of the Audit Committee, the composition of Audit committee was duly constituted on 24.07.2019 as required in Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements), 2015. Further, both the Stock Exchanges (BSE & NSE) waived the penalty imposed on the Company.

Place: Ghaziabad
Date: 29.06.2021

**For Santosh Kumar Pradhan
Company Secretaries**



**Santosh Kumar Pradhan
Proprietor
C. P. No. : 7647
FCS No. F6973
UDIN: F006973C000539001**