

# Anant Raj Limited

(Formerly Anant Raj Industries Limited)

CIN : L45400HR1985PLC021622

Head Off : H-65, Connaught Circus, New Delhi-110 001

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E-mail : info@anantrajlimited.com Website : www.anantrajlimited.com

Regd. Office : CP-1, Sector-8, IMT Manesar, Haryana-122051

Telefax : (0124) 4265817



**ARL/CS/13183**

**May 18, 2022**

The Manager Listing Department <b>B S E Limited,</b> Phiroze Jee Jee Bhoy Towers, Dalal Street, Mumbai – 400001	The Secretary, <b>National Stock Exchange of India Limited,</b> "Exchange Plaza", 5th Floor, Plot No. C/1, G-Block, Bandra – Kurla Complex, Bandra (E), Mumbai-400051
<b>Scrip code: 515055</b>	<b>Scrip code: ANANTRAJ</b>

**Sub: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/Madam,

In reference to the compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report issued by Ms. Priya Jindal, Practicing Company Secretary for the financial year ended March 31, 2022.

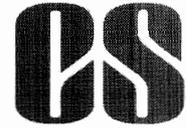
Kindly take the same on record.

Thanking You,  
For **Anant Raj Limited**

  
**Manoj Pahwa**  
**Company Secretary**  
A7812



Encl: As above



PRIYA JINDAL  
36, Lok Nayak Apartments,  
Sector-9, Rohini, Delhi-110085

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF ANANT RAJ LIMITED  
FOR THE YEAR ENDED MARCH 31, 2022**

To

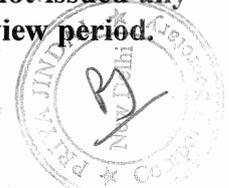
**Anant Raj Limited,**  
Plot No. CP-1,  
Sector-8, IMT Manesar  
Gurugram-122051

I, Priya Jindal, Practicing Company Secretary have examined

- (a) all the documents and records made available to me and explanation provided by the Company (“the listed entity”),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, and
- (d) 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:
  - a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the regulations, circulars, guidelines issued thereunder; and
  - b) the Securities and 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 the Company has not buy back its shares during the review period.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; / Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not Applicable as the Company has not issued any shares-based employee benefits during the review period.**
- f) Securities And Exchange Board Of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - **Not Applicable as the Company has not issued any Non-Convertible and Redeemable Preference Shares during the review period.**





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- g) Securities and Exchange Board of India (Prohibition of Insider trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars /guidelines issued thereunder;

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

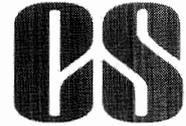
- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1	As per Regulation 29 of SEBI (LODR) Regulations 2015, the listed entity shall give prior intimation to the Stock exchange(s) about the meeting of the Board of Directors for the proposals mentioned in the said regulation.	Delay in furnishing prior intimation about the meeting of Board of Directors held on December 25, 2021 for fund raising.	The Company is non-compliant/late Compliant with the Regulation 29(2)/29(3) of SEBI (LODR) Regulations,2015

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued together in so far 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:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1	NSE and BSE	Non-Compliance under	The stock exchange(s) had levied the fine/penalty for delay	The Company is non-compliant/late Compliant with the



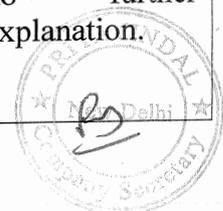


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	Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015	in furnishing prior intimation to Stock exchange(s) about the meeting of the Board of Directors held on December 25, 2021	Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015  The Company has paid the fine/Penalty levied by the Stock Exchange(s).
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d) The listed entity has taken the following actions to comply with the Observations made in previous reports: -

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1	The Company filed the Shareholding Pattern with a delay of twenty days for the quarter ended June 30, 2020	2020-2021	The Company paid the fine/Penalty levied by the Exchange (s) for the delay filing of shareholding pattern for the quarter ended June 30, 2020.	The Company has now complied with the provisions of Regulation 31 of SEBI (LODR) Regulations, 2015 and needs no further explanation.
2	The Company filed the Financial Results with a delay of a month for the quarter and year ended March 31, 2020.	2020-2021	The Company paid the fine/penalty levied by the Exchange (s) for the delay filing of Audited Financial Results (Standalone and Consolidated) for the Quarter and year ended March 31, 2020	The Company has now complied with the provisions of Regulation 33 of SEBI (LODR) Regulations, 2015 and needs no further explanation.

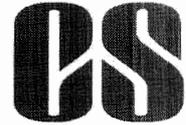




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3.	The Company filed the Reconciliation of Share Capital Audit Report with a delay of two days for the quarter ended June 30, 2020	2020-2021	For the Quarter ended June 30, 2020, the Company filed the Reconciliation of Share Capital Audit Report on August 2, 2020 i.e. with a delay of two days.	The Company has now complied with the provisions of Regulation 76 of SEBI (LODR) Regulations, 2015 and needs no further explanation.
4	Due to continuing impact of the CoVID-19 pandemic and many other reasons like continuing lockdown, subsidiaries and associates situated in containment zones making the Board process challenging and other operational challenges due to the CoVID-19 pandemic, the Company failed to hold its Board Meeting, Audit Committee meeting within Stipulated time period. First Board Meeting/Audit Committee of the Company was held on August 28, 2020 after the Board Meeting/Audit Committee of February 14, 2020.	2020-2021	None	None





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	The Gap between the intervening meetings exceeded 120 days.			
5	The Company filed the Annual Secretarial Compliance Report with a delay of Forty seven days for the year ended March 31, 2020.	2020-2021	The Company filed the Annual Secretarial Compliance Report for the year ended March 31, 2020 on September 17, 2020 i.e. with a delay of Forty seven days	The Company has now complied with the provisions of Regulation 24A of SEBI (LODR) Regulations, 2015 and needs no further explanation

I, further report that, the listed entity has complied with points 6(A) and 6(B) as mentioned in SEBI Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019 and that they have incorporated all the terms and conditions in the respective appointment letter/supplemental letter issued to the Statutory Auditor.

**Place: New Delhi**  
**Date: 13.05.2022**  
**UDIN: A052116D000313487**



**Priya Jindal**  
**CP No.:20065**