

**SADHNA BROADCAST LIMITED**

Registered Office: 37, Second Floor, Rani Jhansi Road, Motia Khan, Paharganj, New Delhi- 110055

Email ID: [cbnl.delhi@gmail.com](mailto:cbnl.delhi@gmail.com), Website: [www.sadhna.com](http://www.sadhna.com)

Phone: 91-11-23552627, Fax No.: 91-11-23524610

To,

**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai-400001

**Metropolitan Stock Exchange Limited**  
205(A), 2<sup>nd</sup> Floor, Piramal Agastya Corporate Park,  
Kamani Junction, LBS Road, Kurla (West),  
Mumbai-400070

Sub: Submission of Annual Secretarial Compliance Report vide SEBI Circular NoCIR/CFD/CMD1/27/2019 dated February 08, 2019 and Regulation 24A of SEBI(Listing Obligation and Disclosure Requirement) Regulation, 2015 for the year ended 31<sup>st</sup> March, 2023

Dear Sir,

In pursuant to SEBI Circular No CIR/CFD/CMD 1/27/2019 dated February 08, 2019 and Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015, we are attaching herewith the Annual Secretarial Compliance Report of Sadhna Broadcast Limited issued by M/s V Kumar & Associates, Practicing Company Secretaries dated 29 May, 2023 for the financial year ended 31<sup>st</sup> March, 2023.

Please find the same enclosed herewith.

Kindly consider and take our submission in your records.

Thanking You

Yours faithfully

For Sadhna Broadcast Limited



**BAL MUKUND TIWARI**  
DIN: 02566683  
Managing Director



# V KUMAR AND ASSOCIATES

Company Secretaries

15/18, Basement, West Patel Nagar, New Delhi-110008

Ph. : +91-11-2588 5492, M. : +91-99102 18035

E-mail : csvivekkumar@gmail.com

Ref. No.

Date .....

## Secretarial Compliance Report of Sadhna Broadcast Limited for the year ended 31<sup>st</sup> March, 2023

I **Vivek Kumar**, Practicing Company Secretary have examined:

(a) All the documents and records made available to us and explanation provided by **Sadhna Broadcast Limited** ("the listed entity"),

(b) The filings/ submissions made by the listed entity to the stock exchanges,

(c) Website of the listed entity.

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2023 in respect of compliance with the provisions of:

(1) The Securities and Exchange Board of India Act, 1992 ("SEBI ACT") and the Regulations, circulars, guidelines issued there under; and

(2) The Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI"); including

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) 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 during the Audit Period)**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Audit Period)**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Audit Period)**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



(h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013. **(Not Applicable during the Audit Period)**

(i) and circular/guidelines issued thereunder; and based on the above examination, I hereby report that, during the review period:-

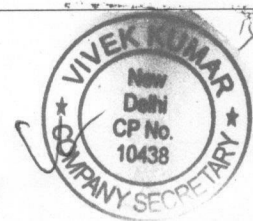
(a) The listed entity has complied with the provisions of the above Regulations and Circular/guidelines issued thereunder, except in respect of matters specified below:

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Several of the trades undertaken by entity Shreya Gupta was not reflected in the System Driven Disclosures under Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Late submission of Disclosure under Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Disclosure was submitted and reason for delay was filled.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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:

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 has taken action against Promoter of Sadhna Broadcast Limited i.e. GAURAV GUPTA, POOJA AGGARWAL, SHREYA GUPTA, SAURABH GUPTA, VARUN MEDIA PRIVATE LIMITED)	Interim Order on violation of Securities and Exchange Board of India Act, 1992 and SEBI(Prohibition of Fraudulent and Unfair Trade Practices Relating to	Freeze of Demat Account, Securities are not transferred / Redeemed.	Secretarial Auditor has concern against the order of sebi and address the company In this regard.



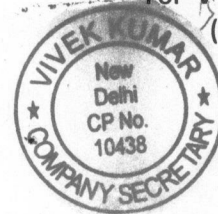
		Securities Market) Regulations,2003		
2.	SEBI has taken action against Director of Sadhna Broadcast Limited i.e. Arpan Gupta	Interim Order on violation of Securities and Exchange Board of India Act, 1992 and SEBI(Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations,2003	Freeze of Demat Account, Securities are not transferred / Redeemed.	Secretarial Auditor has concern against the order of sebi and address the company In this regard

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Date: 29<sup>th</sup> May, 2023

Place: New Delhi



For Vivek Kumar and Associates  
(Company Secretaries)

*Vivek Kumar*  
Vivek Kumar

M. No. : F8976

COP No: 10438

UDIN: F008976E000411202