



June 22, 2021

To,
The Manager,
Listing Department,
National Stock Exchange of India Ltd.
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051

To,
The Manager,
Listing Department,
BSE Ltd.
P J Towers, Dalal Street,
Mumbai -400001, India

NSE Symbol: SKIL

BSE Security Code: 539861

Dear Sir/Ma'am,

Sub: Submission of Annual Secretarial Compliance Report for year ended March 31, 2021 under Regulation 24A of SEBI (LODR) Regulations, 2015.

With reference to captioned subject and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 please find enclosed the Annual Secretarial Compliance Report for the Financial year ended March 31, 2021.

Kindly take the same in your record.

Thanking you,

For **SKIL Infrastructure Limited**

Nilesh Mehta
Company Secretary

SKIL Infrastructure Limited

SKIL House, 209, Bank Street Cross Lane, Fort, Mumbai -400 023. Tel.: +91 022 6619 9000, Fax .: +91 022 2269 6023
E-mail:skil@skilgroup.co.in, website: www.skilgroup.co.in, CIN No. L36911MH1983PLC178299



Secretarial compliance report of SKIL Infrastructure Limited for the year ended March 31, 2021

I, **Jaisal Mohatta**, Proprietor of **Jaisal Mohatta & Associates** has examined:

- a) all the documents and records made available to us and explanation provided by **SKIL Infrastructure 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 31st 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");

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; (**Not applicable as there was no reportable event during the period under review**);
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;





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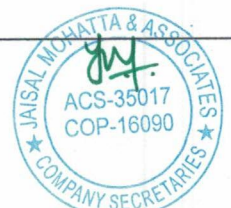
- d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable as there was no reportable event during the period under review);**
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable as there was no reportable event during the period under review);**
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable as there was no reportable event during the period under review);**
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable as there was no reportable event during the period under review);**
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. The 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: -

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Pursuant to SEBI/HO/DDHS/CIR/P/2018/144 A listed entity, identified as a LC under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed	There was delay in filing of said Disclosure for the FY ended on March 2021. The same disclosure was filed Company on 03 rd May 2021.	Due to COVID-19 and situation beyond the control of the Company delay happened. It was non-intentional and same was filed on 03 rd May 2021. As on date of report said regulation is complied with.





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2	Pursuant to the SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019 and in compliance with the Listing Regulations - Disclosures by listed entities of defaults on payment of interest/ repayment of principal amount on loans from banks / financial institutions.	There was delay in filing of said Disclosure for the Quarter ended on March 2021. The same disclosure was filed Company on 16 th April 2021.	Due to COVID-19 and situation beyond the control of the Company delay happened. It was non-intentional and same was filed on 16 th April 2021. As on date of report said regulation is complied with.
3.	As per Regulation 14 of SEBI (Listing Obligations & Disclosure Requirements), 2015 - The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the Board or the recognised stock exchange(s).	Company has not paid listing fees FY 2020-2021.	Listing fees is still payable.

- 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/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:

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.
	Nil	Nil	Nil	Nil

- d. The listed entity has taken the following actions to comply with the observations made in previous reports:





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Company Secretaries

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on 31 st March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Pursuant to the SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019 and in compliance with the Listing Regulations - Disclosures by listed entities of defaults on payment of interest/ repayment of principal amount on loans from banks / financial institutions.	There was delay in filing of said Disclosure for the Quarter ended on December 2019. The same disclosure was filed on 10 th January 2020.	It was filed after due date	Said observation was duly Compiled and found ok.

We have conducted online verification & examination of records, as facilitated by the Company, due to Covid-19 and subsequent lockdown situation for purpose of issuing this report.

For Jaisal Mohatta & Associates
Company Secretaries



(Jaisal Mohatta)

Proprietor

ACS - 35017, COP - 16090

Surat, 21st June 2021

UDIN: A035017C000492584