

SRI HAVISHA HOSPITALITY AND INFRASTRUCTURE LIMITED

(Formerly Shri Matre Power & Infrastructure Limited & Shri Shakti LPG Limited)

CIN: L40102TG1993PLC015988

To,
The Secretary,
Listing Department
BSE Limited P.J Towers,
Dalal Street, Fort,
Mumbai - 400 001
SCRIP CODE: 531322

To,
The Manager,
Listing Department,
National Stock Exchange of India Limited Exchange
Plaza. 5th Floor, Plot No. C/1, G Block Bandra-Kurla
Complex, Bandra (E), Mumbai-400051, Maharashtra.
SYMBOL: HAVISHA

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We are enclosing herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2021 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015,

This is for your information and record.

Thanking You,
Yours Faithfully,
Sri Havisha Hospitality And Infrastructure Ltd

Rahul Jain

Rahul Jain
Company Secretary and Compliance Officer
Membership No- A 62949
Date: June 30, 2021
Place: Hyderabad



Venus Plaza, Begumpet, Hyderabad 500 016, INDIA

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KRISHNA KUMAR.A, FCS



KRISHNA KUMAR & ASSOCIATES

COMPANY SECRETARIES

H. No 2-2-114/27, New Nallakunta

HYDERABAD-500044, TS

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Secretarial Compliance Report of Sri Havisha Hospitality and Infrastructure Limited (Formerly Shri Matre Power & Infrastructure Limited and Shri Shakti LPG Limited) for the year ended 31st March, 2021 (Pursuant to SEBI - CIR/CFD/CMD1/27/2019, Dated 8th February, 2019)

I, A. Krishna Kumar, Proprietor, Krishna Kumar & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by the management of Sri Havisha Hospitality and Infrastructure Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, (to be updated)
- (d) any other document/ filing, conformation, 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 there under; and
- (b) the Securities Contracts (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");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 to the Company for the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company for the review period)



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company for the review period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the Company for the review period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued there under;

and based on the above verification was done on test basis and explanations given by the Management of the Company , 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 there under, 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.	Regulation 29 (2) (3) of SEBI LODR Regulations, 2015 - A listed entity is required to give prior intimation to the Stock Exchanges about the Meeting of the Board.	The Company Delayed compliance by a few hours with the said requirement of Listing Regulations for the Meeting of the Board held on August 31, 2020.	Delay is reportedly due to network error

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




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	National Stock Exchange of India Limited & BSE	Regulation 6 of SEBI- LODR – Non-appointment of a qualified Company Secretary as the compliance officer as on quarter ended 30th Sept 2020.	1.Fine Of Rs 31,860/- (including GST)was imposed by NSE 2. BSE also appears to have imposed similar fine.(only oral conformation from the Company)	We were informed by the Company that due to lock down restrictions imposed by the Government on account of COVID 19 there was a delay in appointment. The company has represented the matter before NSE & BSE. for delayed appointment and waiver of fine. We have been informed that the matter is under consideration by NSE and BSE. The Company confirmed that the Company Secretary was appointed. W.e.f 23 rd Nov 2020
2	National Stock Exchange of India Limited & BSE	Regulation 17(1) of SEBI LODR –Non compliance as on quarter ended 30th June 2020	1. Fine Of Rs 5,25,100/- (Including GST)was imposed . 2. BSE also appears to have imposed similar fine.(only oral conformation from the Company)	We were informed that due to then lock down restrictions imposed by the Government on account of COVID 19, there was a delay in appointment The company has represented the matter before NSE & BSE for waiver of fine. We have been informed that the matter is under consideration by NSE and BSE. TheCompany confirmed that Independent Director was appointed on 29th June, 2020.
3.	National Stock Exchange of India Limited	Regulation 29 (2) (3)of SEBI LODR Regulations, 2015 - A listed entity is required to give prior intimation to the Stock Exchanges about the Meeting of the Board	Fine of Rs 11800/- (Including GST)was imposed	The Company has paid the fine. The management has also ensured to take all possible measures as to avoid subsequent non compliance.



(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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Non compliance of Regulation 6 (1) of SEBI LODR Regulations, 2015	FY 2019-20	The Company has appointed Mr.Rahul Jain as Company Secretary&Compliance Officer of the Company with effect from November 23, 2020	There has been a slight delay in appointment of a qualified Company Secretary due to lock down restrictions imposed by the Government on account of COVID 19 and in finding out a suitable candidate for the position.
2.	Non compliance of Regulation 17 (1)(b) of SEBI -LODR Regulations, 2015	FY 2019-20	The Company has appointed Mr. Abhaya Shankar as Independent Director of the Company w.e.f 29 th June 2020.	There has been a slight delay in appointment of Independent Director to comply with the Regulation, due to lock down restrictions imposed by the Government on account of COVID 19 and in identifying qualified and experienced person for the position.

For KRISHNA KUMAR & ASSOCIATES,
Company Secretaries,


A. KRISHNA KUMAR
FCS: 5356
CP :4707



Place: Hyderabad
Date: 18th June, 2021
UDIN: **F005356C000485011**

*Disclaimer Note: During this challenging time of COVID 19 outbreak, this report has been undertaken to the best of our capability based on of e verification of scans, soft copies, information, oral confirmations, records and documents made available to us by the management.