

20th December, 2021

National Stock Exchange of India Limited, "Exchange Plaza", C-1, Block G, Bandra Kurla Complex, Bandra (East), Mumbai-400051

Script Code: 532873

BSE Limited 25<sup>th</sup> Floor, New Trading Ring, Rotunda Building, PJ Towers, Dalal Street, Fort, Mumbai-400001

**Security Symbol: HDIL** 

Subject: Disclosure under Regulation 24A of Securities and Exchange Board of India

(Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR) and in terms of SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08,

**2019** 

**RE:** Annual Secretarial Compliance Report for the Financial Year ended March 31,

<u>2021</u>

Dear Sir / Madam,

With reference to the above captioned subject and Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 & in terms of SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019 we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2021 issued by Keyur J. Shah & Associates, Practicing Company Secretary.

Kindly take the same in your records and inform the Stakeholders accordingly

Thanking you,

For Housing Development and Infrastructure Limited.

A N Manudhane Resolution Professional

(M/s. Housing Development and Infrastructure Limited is under Corporate Insolvency Resolution Process pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. Its affairs, business and assets are being managed by the Resolution Professional, Mr. Abhay N Manudhane appointed by Hon'ble National Company Law Tribunal, Mumbai Bench, Mumbai, vide order dated 20<sup>th</sup>August, 2019)



### KEYUR J. SHAH & ASSOCIATES COMPANY SECRETARIES

INSOLVENCY PROFESSIONAL | REGISTERED VALUER

### SECRETARIAL COMPLIANCE REPORT OF HOUSING DEVELOPMENT AND INFRASTRUCTURE LIMITED

For the Financial Year ended on 31st March, 2021

#### We, **Keyur J. Shah & Associates**, **Company Secretaries** have examined:

- a) The data and documents made available to us by Mr. Abhay N. Manudhane (Resolution Professional) of M/s. HOUSING DEVELOPMENT & INFRASTRUCTURE LTD having CIN: L70100MH1996PLC101379 ("the Listed Entity/ Company") (M/s. Housing Development and Infrastructure Limited is under Corporate Insolvency Resolution Process ("CIRP") pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. Its affairs, business and assets are being managed by the Resolution Professional, Mr. Abhay N. Manudhane appointed by Hon'ble National Company Law Tribunal, Mumbai Bench, vide order dated 20th August, 2019);
- b) the filings/ submissions made by the listed entity to the stock exchanges;
- c) website of the listed entity i.e., <a href="http://www.hdil.in/">http://www.hdil.in/</a>;
- d) any other document/filing, as may be relevant, which has been relied upon to make this certification.

# For the year ended March 31, 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 applicable Regulations, circulars, guidelines issued thereunder; and
- b) The Securities Contract (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;







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1007, Sun Avenue One,



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: *Not Applicable as no securities were bought back by the Listed entity during the reporting period;*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: Not Applicable as no securities were issued to the employees under Employee Stock Option Scheme or Employee Stock Purchase Scheme by the listed entity during the reporting period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not Applicable as no Debt securities were issued by the listed entity during the reporting period;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013: *Not Applicable as no Non-Convertible and Redeemable Preference Shares were issued by the listed entity during the reporting period;*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and circulars/guidelines issued there under;

It may be noted that as per the provisions of Insolvency and Bankruptcy Code, 2016 and provisions of Regulation 15 (2A) and (2B) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 as amended from time to time, the provisions specified in regulation 17, 18, 19, 20, 21 shall not be applicable during the CIRP.

The provisions as specified in said regulations of the SEBI (LODR), 2015 shall not be applicable during the CIRP and the roles and responsibilities of the board of directors and the committees, specified in the respective regulations, shall be fulfilled by the interim resolution professional or resolution professional, as the case may be.

Based on the above examination, we hereby report that, during the Review Period (i.e.,  $01^{st}$  April, 2020 to  $31^{st}$  March, 2021) \*:

(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.	<b>Regulation Name</b>	Regulation	Compliance	Deviations	Observations/ Remarks
No.	/SEBI Circular	Number/	requirement	•	of the Practicing
	number	circular	(regulations/cir		Company
		dated	culars/		Secretary
		×	guidelines		
			including		
			specific clauses)		
1.	SEBI (Listing	Regulation	The listed entity	Compliance	The Company had made the
	Obligations and	7(3)	shall submit a	Certificate	intimations of compliance
	Disclosure		compliance	certifying	certificate to the stock
	Requirements)		certificate to the	maintaining	exchanges for the half year
	Regulations, 2015		exchange, duly	physical &	ended on 31st March, 2020
			signed by both	electronic transfer	30th September, 2020 and
	9		that is by the	facility for half	31st March, 2021 after the
		. *	compliance	yearly ended on	due date. The said delay was
			officer of the	•31/03/2020:	caused due to non-
			listed entity and	Intimation to Stock	availability of employees of
	1		the authorized	Exchanges was	the Compliance Team /
	*		representative of	done on 23.02.2021	Senior Management of the
			the share transfer	after the due date	Company and as informed
	Tax		agent, wherever	•30/09/2020:	by the Resolution
			applicable, within one month of end	Intimation to Stock	Professional (RP), the
			of each half of the	Exchanges was	Company officials did not
п				done on 23.02.2021	provide the credentials of
			financial year, certifying	after the due date •31/03/2021:	BSE and NSE to the
			maintaining	Intimation to Stock	Resolution Professional to
			physical &	Exchanges was	carry out such compliance on timely manner.
			electronic	done on 29.05.2021	on timely manner.
			transfer facility	after the due date	
	2		either in house or	arter the due date	
			RTA as applicable.		
2.	SEBI (Listing	Regulation 9	Preservation of	Supporting	We are unable to comment
	Obligations and		documents	Documents to	on such compliances as
	Disclosure		1/	Acknowledge /	required under the said
	Requirements)			Substantiate the	Regulations as Supporting
27	Regulations, 2015			said compliance of	Documents to Acknowledge
	9	8.	,	Regulation 9 are	/Substantiate the said
		,		not provided.	compliance of Regulation 9
				v .	are not available with the
					Company or RP, as some of
					the permanent records are
					in the custody of
				~	investigating agencies;





					therefore, it is not made
				•	available to us for
					verification.
3.	SEBI (Listing	Regulation	Filing of	The filing of the	The filing of the reports,
	Obligations and	10	information	reports,	statements, documents,
	Disclosure			statements,	filings and any other
	Requirements)		,	documents, filings	information with the
	Regulations, 2015		E .	and any other	recognized stock
				information with	exchange(s) was not
			A 1	the recognized	submitted within the
				stock exchange(s)	prescribed due date by the
		×		is not submitted	Company/ Resolution
15	,	e e		within the	Professional. The said delay
	,	8		prescribed due	was caused due to non -
				date.	availability of employees of
	2				the Compliance Team /
					Senior Management of the
					Company and as informed
	* ,				by the Resolution
					Professional (RP), the
					Company officials did not
				•	provide the credentials of
					BSE and NSE to the
					Resolution Professional to
					carry out such compliance
4.	SEBI (Listing	Regulation	The listed entity	Statement giving	on timely manner
	Obligations and	13 (3)	shall file with the	number of investor	The Company has not filed the statement showing the
	Disclosure	10 (0)	recognised stock	complaints pending	
	Requirements)		exchange(s) on a		,
	Regulations, 2015		quarterly basis,	at the beginning of	complaints pending at the
5	regulations, 2015		within twenty -	the quarter ended	beginning of the quarter
			one days from the	on -21/02/2020	ended on 31st March, 2020,
			end of each	•31/03/2020	30th June, 2020 and 30th
				•30/06/2020	September, 2020 as the
				•30/09/2020	required data from the RTA
			statement giving the number of	were not intimated	was not made available to
	*			to the Stock	the RP. Further, the
			investor	exchange. Further	statement giving number of
			complaints	the statement	investor complaints for the
		. 611	pending at the	giving number of	quarter ended on 31st
			beginning of the	investor	March, 2021 was filed after
			quarter, those	complaints pending	the due date. The said delay
			received during	at the beginning of	was caused due to non -
	1		quarter, disposed	the quarter ended	availability of employees of





1					
			of during the quarter and those remaining unresolved at the end of the quarter	on 31/03/2021 was filed on 31/05/2021 after the due date.	the Compliance Team / Senior Management of the Company and also were not provided the credentials of BSE and as informed by the Resolution Professional (RP), the Company officials did not provide the credentials of BSE and NSE to the Resolution Professional to carry out such compliance on timely manner.
5.	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 14	The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the		The Listing Fees is not paid by the Company to the Stock Exchange as the Company is under Corporate Insolvency Resolution Process (CIRP) w.e.f. 20th August, 2019 and the fees for the year 2020-
6.	SEBI (Listing	Regulation	Board or the recognised stock exchange(s).  The listed entity	Supporting	21 due was not paid due to non-availability of funds.  As produced hereinabove,
	Obligations and Disclosure Requirements) Regulations, 2015	22	shall formulate a vigil mechanism for directors and employees to report genuine concerns.	Documents to Acknowledge / Substantiate the said compliance of Regulation 22 are not provided.	the requisite documents/records were not made available to the Resolution Professional.
7.	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 23	Related party transactions. 23. (1) The listed entity shall formulate a policy on materiality of related party transactions and on dealing with related party transactions 46[including clear threshold limits	Policy on Related Party Transaction is not updated or modified or reviewed since 01/10/2014	The Company has not provided relevant updated related party transaction policy for verification.





			duly approved by the board of directors and such policy shall be reviewed by the board of directors at least once every three years and		
	,		years and updated accordingly		
8.	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 23 (9)	Related party transactions. 23.  (9) The listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same	Related Party Transactions for the half yearly ended on •31/03/2020: Not	to disclose the related party transactions for the half yearly ended on 31st March, 2020, 30th September, 2020 and 31st March, 2021 to the stock exchanges.  • The said delay/default was caused due to non-availability of employees
9.	SEBI (Listing	Regulation	on its website.  Every listed entity	Secretarial	The Annual Secretarial
	Obligations and Disclosure Requirements) Regulations, 2015	24A	and its material unlisted subsidiaries incorporated in India shall undertake	Compliance Report for the FY 2019-20 was filed by the Company on 14/10/2021 after the due date.	Compliance Report under regulation 24A was filed by the Company on 14/10/2021 to the relevant stock exchange after the due date with delay.



			secretarial audi		
	18		and shall annex a		
			secretarial audi	t	
			given by a	1	
			company	4	
			secretary in	1	
			practice, in such	i	
			form as specified		
	1		with the annual		
	9		report of the		
		II	listed entity.		
		-	Every listed entity		
			shall submit a	I .	
			secretarial		
			compliance		
	*		report in such		
	x	1	form as specified,		
			to stock		
			exchanges, within		
			sixty days from		
			end of each		
			financial year		
			illianciai year		
			SEBI/HO/CFD/C		
				•	
			MD1/CIR/P/202 0/109		
			Further Extended		F A
			up to 31st July,		10
10.	SEBI (Listing	De sur la ti	2020		
10.			Obligations with	11 0	As informed,
	Obligations and Disclosure	26	respect to	Documents to	the requisite
			employees	Acknowledge /	documents/records were
	Requirements)		including senior	Substantiate the	not made available to the
F	Regulations, 2015		management, key	F	Resolution Professional.
			managerial	Regulation 26 are	
			persons, directors	not provided.	
11	CERT		and promoters		
11.	SEBI (Listing	Regulation	The listed entity	Submission of	The Compliance report
	Obligations and	27	shall submit a	Compliance report	on corporate
	Disclosure		quarterly	on corporate	governance for quarter
	Requirements)		compliance	governance for	ended on 31st March,
	Regulations, 2015		report on	quarter ended on	2020, 30 <sup>th</sup> June, 2020,
			corporate	•31/03/2020.	30 <sup>th</sup> September, 2020
			governance in the	•30/06/2020	and 31st December, 2020
				, ,	ana 31 December, 2020





		1			
			format as	•30/09/2020	was filed after the due
			specified by the	•31/12/2020	date to the stock
			Board from time	was filed after due	exchanges.
	*		to time to the	date on Stock	• The said delay was
			recognised stock	Exchanges.	caused due to non -
			exchange within	8	availability of
			fifteen days from		employees of
		*	close of the		Compliance
			quarter.		Team/Senior
					Management of the
				.w	Company and as
					informed by the
	ı e				Resolution Professional
			P		(RP), the Company
					officials did not provide
	•				the credentials of BSE
		100			and NSE to the
					Resolution Professional
					to carry out such
					compliance on timely
					manner
	,-				
	*				As per the portal of the  Ministry of Course
					Ministry of Commerce -
					Master Data and View
					Signatory Details of the
					Company, Mr. Lalit
					Mohan Mehta (Non-
					Executive Independent
					Director), Mr. Raj
				10	Kumar Aggarwal (Non-
		2		•	Executive Independent
					Director), Ms. Sandhya
					Baliga (Non-Executive
					Independent Director),
					Mr. Hazari Lal (Non-
		,			Executive Independent
				8	Director) have filed
1		2			Form DIR – 11 -Notice of
					resignation of a director
					to the Registrar and
					have resigned from the
				, ,	post of Independent
					Director as on
	3			,	27/09/2019,





		1			
					03/10/2019,
					01/10/2019 and
					27/09/2019. As per
	. ,				confirmation given by
					Resolution professional,
					the COC Members have
					not accepted the said
					resignation in the COC
	9				Meetings and so the said
					Independent Directors
					disclosed under the
					Composition of Board
	u u				and Committee under
	8				the quarterly
					compliance report on
					corporate governance
					as per Regulation 27.
12.	SEBI (Listing	Regulation	Disclosure of	Supporting	Necessary disclosures were
	Obligations and	30	events or	Documents to	made to the stock exchange
	Disclosure		information.	Acknowledge /	from time to time under the
	Requirements)			Substantiate the	said regulation but there
	Regulations, 2015			said compliance of	has been delay in filing
				Regulation 30 are	certain disclosure. The
				not provided.	policy for Determination of
				and provided.	materiality is not available
					for verification and we are
					unable to comment on such
				* *	compliances required under
					the said Regulations as
					Supporting Documents to
					Acknowledge/ Substantiate
					the said compliance of
					Regulation 30 are not
10	CDDI				provided.
13.	SEBI (Listing	Regulation	The listed entity	Intimation with	Intimation to the stock
	Obligations and	31	shall submit to the	respect to the said	exchange showing the
	Disclosure		stock exchange(s)	regulation was not	statement of holding of
	Requirements)		a statement	provided by the	securities and shareholding
	Regulations, 2015		showing holding	Company to the	pattern separately for each
	*		of securities and	stock exchange for	class of securities was not
	, ' , '		shareholding	the quarter ended	provided by the Company
	,	*	pattern	on	for the quarter ended on
			separately for	•31/03/2020	•31/03/2020
				-11-0-0	01/00/2020





	1	2	each class of	•30/06/2020	•30/06/2020
			securities, in the	•30/09/2020	•30/09/2020
			format specified	•31/12/2020	•31/12/2020
			by the Board from	•31/03/2021	•31/03/2021
			time to time		till date as the Company is
			within the		under Corporate Insolvency
			following	4	Resolution Process (CIRP)
			timelines - (b) on		and Payment to
		×	a quarterly basis,		Depositories are not made
			within twenty-		due to non-availability of
			one days from the		funds and so details relating
	7		end of each		to the said Regulation are
			quarter		not provided by NSDL and
			quarter		CDSL to the Resolution
	,	*			
14.	SEBI (Listing	Regulation	The listed entity	Financial Results	Professional.  • The submission of
11.	Obligations and	33	shall submit		
	Disclosure	33	quarterly and		quarterly and standalone
	Requirements)		year-to-date		financial results to the
	Regulations, 2015		standalone	31/03/2020 was filed on Stock	stock exchange, for the
	Regulations, 2015				quarter ended on
	Les de la constant de		financial results	Exchanges after	31/03/2020 was filed
			to the stock	due date i.e., on	after the due date on
			exchange within	28/04/2021.	Stock Exchanges.
			forty- five days of		• The said delay was caused
			end of each		due to resignation of
			quarter, other		Statutory Auditors and
			than the last		non -availability of
			quarter which is		employees of Compliance
			to be submitted		Team/Senior
			within sixty days		Management of the
		*	of end of Financial		Company, as informed by
			Year i.e., March	а .	Resolution Professional.
			Quarter		
			SEBI/HO/CFD/C		
			MD1/CIR/P/202		
			0/106		
			Further Extended	1 1	
	п .	-	up to 31st July,		
			2020		
15.	SEBI (Listing	Regulation	The listed entity	Financial Results	• The Company has failed to
	Obligations and	33	shall submit	for the quarter	submit the quarterly and
	Disclosure		quarterly and	ended on	year year-to-date
	Requirements)		year-to-date	•30/06/2020	standalone financial
	Regulations, 2015		standalone	•30/09/2020	results to the stock
				,	





		r .			
			financial results to the stock exchange within forty- five days of end of each quarter.	•31/12/2020 •31/03/2021 are not filed by the Company on Stock Exchanges.	exchanges within forty- five days from the end of each quarter for quarter ended on 30th June, 2020, 30th September, 2020 and 31st December, 2020 and 31st March, 2021. • The said delay caused due to resignation of Statutory Auditors and non -availability of employees of Compliance Team/Senior Management of the Company, as informed by Resolution Professional.
16.	SEBI (Listing	Regulation	Not before prior	The Company failed	The Company failed to file
	Obligations and	34 (1) & 36	21 days of AGM	to file Annual	Annual report to the stock
10.16	Disclosure	(2)	and not after the	report to the stock	exchange prior to Annual
	Requirements) Regulations, 2015		day of	exchange prior to	general meeting held for
	Regulations, 2015		of dispatch of	Annual general meeting held for	the FY 19-20.
			notice to its	the FY 19-20.	
8			shareholders		
17.	SEBI · (Listing	Regulation	The listed entity	The Company have	Due to non-availability of
	Obligations and Disclosure	34 (1) & 36 (2)	shall submit to the stock exchange	not provided the	requisite proof of dispatch
	Requirements)	(4)	stock exchange and publish on its	proof of dispatch of notice to	of notice to the shareholders and to the
	Regulations, 2015		website a copy of	shareholders.	auditor we cannot
			the annual report	· · · · · · · · · · · · · · · · · · ·	comment on the same.
	9		sent to the		and an area
			shareholders		
E		9	along with the	,	
			notice of the annual general		
			annual general meeting not later		
	, ,		than the day of		
			commencement		
	N N	,	of dispatch to its		
10	CEDI (7)	D 1	shareholders.	,	
18.	SEBI (Listing Obligations and	Regulation 34 & 53	The annual report	Annual Report of	The Annual Report of the
	Disclosure	JT (X J)	shall contain any other disclosures	the Company is incomplete and it	Company is incomplete and
ž.	Requirements)	8	specified in	doesn't contain	it doesn't contain necessary disclosures required as per
	-		111	Contain	disclosures required us per





	Regulations, 2015		Companies Act,		Regulation 34 & 53
			2013 along with		
			other	required as per	-
			requirements as	Regulation 34 & 53	
			specified in	30	
			Schedule V of		
	1		these regulations.		*
19.	SEBI (Listing	Regulation	The listed entity	The Company had	• The Company had filed
	Obligations and	40 (9)	shall ensure that	filed the certificate	the certificate for the
	Disclosure		the share transfer	after causing delay	half year ended on 31st
	Requirements)		agent and/or the	for the half year	March, 2020, 30th
	Regulations, 2015		in-house share	ended on	September, 2020 and
			transfer facility,	30/03/2020,	31st March, 2021 after
		1.	as the case may	30/09/2020 and	the due dates on the
			be, produces a	31/03/2021 with	Stock Exchanges.
			certificate from a	Stock Exchanges.	The delay was caused
			practicing		due to non -availability
			company		of employees of the
	9 9		secretary within		Compliance
			one month from		Team/Senior
			the end of the		Management of the
			financial year,		Company and also
			certifying that all		credentials of BSE and
			certificates have		NSE were not made
			been issued		available to the
	E		within thirty days		Resolution Professional
	1		of the date of		to do such compliance
			lodgement for		on timely manner.
			transfer, sub-		
			division,	9	И
			consolidation,		*
			renewal,		
			exchange or	y 18	
			endorsement of		
			calls/allotment		
			monies.		
20.	SEBI (Listing	Regulation	Website. 46. (1)	Website of the	The Company has failed to
	Obligations and	46	The listed entity	company is not as	disclose the relevant
	Disclosure		shall maintain a	per Regulation 46	information on the website
	Requirements)	×	functional		of the Company in
	Regulations, 2015		website		accordance with
			containing the		Regulation. However, the
			basic information		updates regarding CIRP
			about the listed		have been uploaded on the
					been aploaded on the





	T		T		
			entity.		website of the Company.
21	CEDI (Liatina	Dogulation	The listed services	The New of ACM	The Common land
21.	SEBI (Listing	Regulation	The listed entity	The Notice of AGM	The Company has not
	Obligations and	47	shall publish the	was published in	published the notice of AGM
	Disclosure		information	the Newspaper	simultaneously with the
	Requirements)		specified in sub-	after one day of	intimation of the same with
	Regulations, 2015		regulation (1) in	intimating the same	the stock exchange.
			the newspaper	to the stock	
			simultaneously	exchange.	
		* 4	with the	*	
	7		submission of the		
		7	same to the stock		
			exchange(s).		*
			Provided that		*,
	7	,	financial results		
			at clause (b) of	a second distribution of	
			sub-regulation		A second
			(1), shall be		
			published within		
			48 hours of		
	,		conclusion of the		
	-		meeting of board		
			of directors at		9
			which the		2
			financial results		,
22.	SEBI (Listing	Schedule III,	were approved.		mi c
44.	SEBI (Listing Obligations and	Part A, Para	The listed entity	Copy of	The Company had
	Disclosure		shall disclose the	proceedings of	intimated to BSE about the
	Requirements)	A (13)	proceedings of the Annual	Annual General	outcome of the AGM,
	Regulations, 2015			Meeting were not	although the said AGM was
	Regulations, 2015		General Meeting within 24 hours of	disclosed within 24	adjourned and till date the
			the conclusion of	hours to the	said adjourned AGM for the
	)A		AGM.	concerned stock	F.Y. 2019-20 has not yet
	*		AGM.	exchange(s)	been held. As informed by
				(ACM	the resolution professional
				(AGM was	the said delay for
				adjourned on	submitting the disclosure
				30/12/2020: 12:33 p.m. and disclosure	was caused due to technical
				was made to the	reasons.
		8	,	stock exchanges on	
				31/12/2020: 12:39	
	,			p.m.	V.
					0





	1			<ul> <li>Consolidated</li> </ul>	
	y =		у.	Audited Financial	
		,		Statements were	
				not laid down	
				before the	
				members of the	
				Company for	
				adoption.	
				•Further the	
			, ,	Company had	
		**		about the outcome	
				of the AGM,	
				although the said	
				AGM was	
				adjourned and till	
				date the said AGM	
				has not yet been	
23.	CEDI (Des-1:1:1:	D 1		held.	
43.	SEBI (Prohibition	Regulation 3	Communication	Supporting	As informed, the requisite
	of Insider Trading)		or procurement of	Documents to	documents/records were
	Regulations, 2015		unpublished price	Acknowledge /	not made available to the
			sensitive	Substantiate the	Resolution Professional.
			information.	said compliance of	
				Regulation 3 are	
				not provided.	×
24.	SEBI (Prohibition	Regulation 5	An insider shall be	Supporting	As informed, the requisite
	of Insider Trading)	& 6	entitled to	Documents to	documents/records were
	Regulations, 2015		formulate a	Acknowledge /	not made available to the
	10		trading plan and	Substantiate the	Resolution Professional.
			present it to the	said compliance of	Resolution Projessional.
			compliance	Regulation 5 & 6	*
	e e		officer for	are not provided.	·
			approval and	a. o not provided.	
			public disclosure		
			pursuant to which		
			trades may be		
			carried out on his		
			behalf in		3
	All and a second second		accordance with		11 N
	V .		such plan and the		
			disclosures to be		
				a ,	
		,	made by any		
			person under this		





					×
			Chapter shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.		
25.	SEBI (Prohibition	Regulation 7	Disclosures by	11	As informed, the requisite
	of Insider Trading) Regulations, 2015		certain persons - continual disclosure	Documents to Acknowledge / Substantiate the said compliance of Regulation 7 are not provided.	documents/records were not made available to the Resolution Professional.
26.	SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 8 & 9	Code of Fair Disclosure and Code of Conduct	Supporting Documents to Acknowledge / Substantiate the said compliance of Regulation 8 · & 9 are not provided.	As informed, the requisite documents/records were not made available to the Resolution Professional.
27.	SEBI (Prohibition of Insider Trading) Regulations, 2015	Schedule B	Trading restriction period can be made applicable from the end of every quarter till 48 hours after the declaration of financial results.	Intimation of Closure of Trading Window under the Insider Trading Code for quarter ended on •31/03/2020 •30/06/2020 •30/09/2020 •31/12/2020 •31/03/2021 were not complied with.	The Company has failed to intimate to stock exchange regarding the closure of trading window under the said code for the quarter ended on 31st March, 2020, 30th June, 2020, 30th September, 2020, 31st December, 2020 and 31st March, 2021.
28.	SEBI (Depositories and Participants) Regulations, 2018	Regulation 74 (5)	Within fifteen days of receipt of the certificate of security from the participant the issuer shall	Disclosure of Regulation 74 (5) Certificate for the quarter ended • For quarter ended on	• The Company for the quarter ended on 31st March, 2020, 30th June, 2020, 30th September, 2020, 31st December, 2020 and 31st March,





			confirm to the	•31/03/2020	2021 the certificate under
			depository that	•30/06/2020	the said regulation was
1			securities	•30/09/2020	intimated to the stock
			comprised in the	•31/12/2020	exchanges after the due
		¥	said certificate	• 31/03/2021	date.
			have been listed		• The delay was caused due
			on the stock	were intimated	to non -availability of
		n n	exchange or	after the due date	employees of Compliance
			exchanges where	to the Stock	
	*		the earlier issued	Exchanges	Management of the
			securities are		Company and also
			listed		credentials of BSE and
					NSE were not made
			10		available to the
	-	*			Resolution Professional to
					do such compliance on
	, ,				timely manner.
29.	SEBI (Depositories	Regulation	Listed entities are	Reconciliation of	The Company has not
	and Participants)	76	required to	Share Capital Audit	intimated the reconciliation
	Regulations, 2018		submit	quarter ended on:	of share capital to the stock
			Reconciliation of		exchange within due date
			Share Capital	•31/03/2020	for the quarter ended on
	4		Audit Report on a	•30/06/2020	31st March, 2020, 30th June,
			quarterly basis to	•30/09/2020	2020, 30 <sup>th</sup> September, 2020,
			the stock	•31/12/2020	31st December, 2020 and
	8		exchanges	•31/03/2021	31st March, 2021 due to
			audited by a		non-Payment of Annual
			qualified	were not intimated	Custody Charges to NSDL
	. <u>.</u>		chartered	by the Company to	and CDSL, Benpos has not
			accountant or a	the stock exchange.	been provided by them.
			practicing		Therefore, RP could not
			company	•	comply with the said
			secretary for the		requirement.
			purpose of		
	× I		reconciliation of		¥
			share capital held		50
		,	in depositories		
			and in physical		
			form with the		
			issued / listed		
			capital. The		
			Reconciliation of		
20			Share Capital	и Э	
			Audit Report is		× ×
			•		





				*	
			required to be		
			submitted to the		
			stock Exchange		
			within 30 days		2 2
	2		from the		
	a a	· ·	end of the		
6			Quarter.		
20	CEDI (CACT)	Ďl-+!	-	A -1 1 - 1	4
30.	SEBI (SAST)	Regulation	Continual	Acknowledgement	As informed, the requisite
-	Regulations, 2011	30 (1) and	disclosures. 30	copy for SAST	documents/records were
		30 (2)	(1) Every person,	Annual Disclosure	not made available to the
	,		who together	made to stock	Resolution Professional.
			with persons	exchange are not	
			acting in concert	provided for	
			with him, holds	verification	
			shares or voting		
			rights entitling		
			him to exercise		1
			twenty-five per		
			cent or more of	4	
			the voting rights		
			in a target		
			company, shall		50
			disclose their		N ×
			aggregate		
			shareholding and		
	1 1		voting rights as of		
		*	the thirty first day		
			of March, in such		
		11/2/8211	target company in		
			such form as may		
			be specified. (2)		
			The promoter of		
	<i>a</i>				
		40	every target		,
			company shall		
-			together with	*	
			persons acting in		
			concert with him,	2	
			disclose their	4	
			aggregate		
			shareholding and		9
			voting rights as of		
			the thirty first day		0
	ž.		of March, in such		
			target company in		





			such form as may		
21	CEDI (CACE)	D 1	be specified		,
31.	SEBI (SAST) Regulations, 2011	Regulation 31	Disclosure of encumbered shares	Supporting Documents to Acknowledge / Substantiate the said compliance of Regulation 31 are not provided.	As informed, the requisite documents/records were not made available to the Resolution Professional.
32.	Circular of SEBI/HO/DDHS/C IR/P/2018/144 dated 26th November, 2018		A listed entity identified as a LC under the instant framework, shall make the following disclosures to the stock exchanges, where its security(ies) are listed:  • Within 30 days from the beginning of the FY, disclose the fact that they are identified as a LC.	to fund raising by issuance of debt	Acknowledge /
33.	SEBI Circular No. CIR/CFD/CMD- 1/142/2018		If any listed entity does not submit its financial results in accordance with the timelines specified in Regulation 33 of Listing Regulations, the listed entity shall disclose detailed reasons for such delay to the stock exchanges within one	Financial results for the were filed with the stock exchange beyond the due date of filing the same and Detailed reasons for such delay were not disclosed to the Stock Exchanges.	The said delay caused due to resignation of Statutory Auditors and non - availability of employees of Compliance Team/Senior Management of the Company, as informed by Resolution Professional.





					*
			working day of		
		*	the due date of		
			submission		
			for the results as		8
	i i		required under		
			Regulation 33		
34.	SEBI Circular No.		The listed entity	Supporting	Supporting Documents to
	CIR/CFD/CMD/13		shall comply with	Documents to	Acknowledge /
	/2015 dated	9	the provisions	Acknowledge /	Substantiate the said
	November		and disclosure as	Substantiate the	compliance of the said
	30, 2015 and		per the said	said compliance of	
	Circular No.		circular for	the said Circular	
	SEBI/HO/CFD/CM		disclosure of	are not provided.	
	D1/CIR7		holding of	*	
	/P/2018/149		specified		
	dated December 7,		securities		14
	2018 - &		and shareholding		
	Circular No.		pattern under		
	SEBI/HO/CFD/CM		Annexure-1		
	D1/CIR/P/2019/		to the circular.	*	
	36		Further, Ministry		
	dated March 12,		of Corporate		
	2019 -		Affairs vide		100
	Modification of		notification dated		
	circular dated		June 14, 2018 has		
	December 7, 2018		notified		•
	on		the Companies		
	'Disclosure of _		(Significant		
	significant		Beneficial		
	beneficial		Owners) Rules,		
	ownership in the		2018 under which	1	
	shareholding		various		
	pattern'		requirements		
			pertaining to _		x
			disclosures		
	1		regarding		
			Significant		
		*	Beneficial Owners		
			have		
			been specified		





35.	CIR/CFD /POLICYCELL/3/ 2015 dated 05th August, 2015	disclosures	Acknowledge / Substantiate the said compliance of the said Circular	Supporting Documents to Acknowledge / Substantiate the said compliance of the said circular are not provided.
			are not provided.	

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines (subject to the comments made hereinabove) issued there under insofar as it appears from our examination of those records.
  - As, informed by the Resolution Professional, the Records of Board and Committee Meeting minutes and its related documents and records as per above mentioned Regulations and Circular / Guidelines held till the date of CIRP are in custody of Economic Offences Wing and hence, we are unable to comment on such compliances required under the said Regulations as the Supporting Documents to Acknowledge / Substantiate the said compliance are not provided to us for verification due to confidentiality issue. Further we are unable to verify/comment on the Committee of Creditor's minutes of the Company in relation to Regulations and circulars/guidelines mentioned above, as not provided by the Resolution Professional due to the confidentiality issues.
- (c) There were no 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 except:

The Resolution Professional has not made available with any action taken against the promoters, directors, material subsidiaries by SEBI or stock exchanges. Further attaching herewith the notices issued by Stock exchanges for your reference.

Sr.	Action taken	Details of violation	Details of action	/
No.	by		taken	remarks of the
			(e.g., fines, warning	Practicing
			letter, debarment,	Company
			etc.)	Secretary, if any.
1	National	Non-compliance with	It is observed that the	As informed by the
	Stock	Regulation 33 of SEBI	company has failed to	Resolution
	Exchange of	(LODR)Regulations, 2015	submit the Financial	Professional the said
	India Limited		Results for Quarter	fine of Rs. 1,65,200
	via letter		ending on 31st	levied by NSE
	dated 15 <sup>th</sup>	-	December, 2020.	(National Stock
	March, 2021	a .	Hence, Fine payable	Exchange of India





			(Inclusive of 18% GST) of Rs. 1,65,200 levied for noncompliance with Regulation 33.	Limited) is not yet paid by the Company.
2	National Stock Exchange of India Limited via letter dated 17th May, 2021	Non-compliance with Regulation 13 (3) and Regulation 31 of SEBI (LODR) Regulations, 2015	It is observed that the company has failed to submit a statement giving the number of investor complaints pending at the beginning of the quarter and Statement showing holding of securities on time and has failed to submit shareholding pattern separately for each class of securities for Quarter ending on 31st March, 2021. Hence, Fine payable (Inclusive of 18% GST) of Rs. 88,500 levied for noncompliance with Regulation 13 (3) and Regulation 31.	As informed by the Resolution Professional the said fine of Rs. 88,500 levied by NSE (National Stock Exchange of India Limited) is not yet paid by the Company.
3	National Stock Exchange of India Limited via letter dated 29 <sup>th</sup> July, 2021	Non-compliance with Regulation 24A and Regulation 33 of SEBI (LODR)Regulations, 2015	It is observed that the company has failed to submit the Financial Results for Quarter ending on 31st March, 2021 and Annual Secretarial Compliance Report under regulation 24A for the Year ended on March, 2021. Hence, Fine payable (Inclusive of 18% GST) of Rs. 2,39,540 levied for non-	As informed by the Resolution Professional the said fine of Rs. 2,39,540 levied by NSE (National Stock Exchange of India Limited) is not yet paid by the Company.





				3
			compliance with	
4	,		Regulation 33.	
4	National Stock Exchange of India Limited via letter dated 16 <sup>th</sup> August, 2021	Non-compliance with Regulation 31 of SEBI (LODR)Regulations, 2015	1 6 11 1	fine of Rs. 59,000 levied by NSE (National Stock Exchange of India
5	National Stock Exchange of India Limited via letter dated 20th August, 2021	Non-compliance with Regulation 6 (1), Regulation 7 (1) SEBI (LODR)Regulations, 2015 and Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	It is observed that the company has failed to appoint a qualified company secretary as the compliance officer and appoint a share transfer agent and has filed to submit Reconciliation of Share Capital Audit for Quarter ended on 31st March, 2021. Hence, Fine payable (Inclusive of 18% GST) of Rs. 2,12,400 levied for entire quarter for noncompliance with regulation 6(1) and 7(1) and Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018.	As informed by the Resolution Professional the said fine of Rs. 2,12,400 levied by NSE (National Stock Exchange) is not yet paid by the Company





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

Sr. No.	Regulation Name/ SEBI Circular number*	the secretarial compliance report by the PCS for the	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
2		previous year ended 31.03.2020		
1.	Regulation 7 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Intimation of Compliance Certificate under Regulation 7 was intimated to Stock Exchanges for half yearly ended on September, 2019 & March, 2020 were made on 23.02.2021 & 23.02.2021 after the due date.	caused due to non - availability of employees of Compliance Team/Senior Management of the Company and also were not provided the credentials of BSE and NSE to the Resolution Professional to do such compliance on timely manner, as informed by	
2.	Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Supporting Documents to Acknowledge / Substantiate the said compliance of Regulation 9 are not provided.	Resolution Professional.  Some of the permanent records were in the custody of investigating agencies; therefore, it is not made available for verification	
3.	Regulation 10 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The filing of the reports, statements, documents, filings and any other information with the recognized stock exchange(s) is not submitted within the prescribed due date by the Company/Resolution  Professional. The said delay caused due to non -availability of	The said delay caused due to non -availability of employees of Compliance Team/Senior Management of the Company and also were not provided the credentials of BSE and NSE to the Resolution Professional to do such compliance on timely manner, as informed by	
	1	employees of Compliance	Resolution Professional.	





				ar .
		Team/Senior		
-		Management of the		
		Company and also		
		were not provided the		
		credentials of BSE and		,
		NSE to the Resolution		
8	8 50	Professional to do such		·
		compliance on timely		
	9	manner, as informed by		
		Resolution		
		Professional.		
		Professional.	*	
4.	Dogulation 12 of	Tarting of C		
4.	Regulation 13 of SEBI (Listing		The said delay caused due	The Company has not yet intimated
	(	statement as per	to non -availability of	Statement as per Regulation 13 for
	Obligations and	Regulation 13 for	employees of	September, 2019 and March, 2020
	Disclosure	September, 2019 and	Compliance	quarter to BSE (Bombay Stock
	Requirements)	March, 2020 quarter	Team/Senior	Exchange) and for March, 2020 quarter
	Regulations, 2015	were not intimated to	Management of the	was not intimated to NSE (National
		BSE (Bombay Stock	Company and also were	Stock Exchange)
		Exchange) and for	not provided the	
		December, 2019	credentials of BSE and	
		intimation was made	NSE to the Resolution	
		on 01.02.2020 after the	Professional to do such	
		due date.	compliance on timely	J
		•Intimation of	manner, as informed by	
		statement as per	Resolution Professional.	
		Regulation 13 for		
		March, 2020 quarter		9
		was not intimated to		•
		NSE (National Stock		
		Exchange) and for		
		September, 2019 &		2
	i	December, 2019		9
	9	intimation were made		
		on 03.02.2020 &		
		29.01.2020 after the		*
		due date. The said		
		delay caused due to		
		non -availability of		
		employees of	w = 26	
	9	Compliance	, , ,	
		Team/Senior		
		Management of the		
		Company and also		×
		und also		*





		were not provided the		
	3	credentials of BSE and		,
	(6)	NSE to the Resolution		
		Professional to do such		,
		compliance on timely		
		manner, as informed by		
		Resolution		
		Professional.		,
5.	Regulation 14 of	Listing Fees is not paid	The fees for the year	The Listing Fees is not paid by the
	SEBI (Listing	by the Company to the	2019-20 due was not	Company to the Stock Exchange as the
	Obligations and	Stock Exchange as the	paid due to non-	Company is under Corporate Insolvency
	Disclosure	Company is under	availability of funds.	Resolution Process (CIRP) w.e.f. 20th
	Requirements)	Corporate Insolvency	aramaning of failed	August, 2019.
	Regulations, 2015	Resolution Process		1149 450, 2017.
		(CIRP) w.e.f. 20th		
		August, 2019 and the		
		fees for the year 2019-		
		20 due was not paid		
		due to non-availability		
	10	of funds.		
6.	Regulation 17 of	The said Certificate is		
.	SEBI (Listing	Signed by Managing		
	Obligations and	Director and not by		
	Disclosure	Chief Financial Officer		
	Requirements)	of the Company in the		
	Regulations, 2015	Annual Report of		*
	2020	company for Financial		
		Year 18-19.		
7.	Regulation 17, 18,	As, informed by the	The Resolution	
	19, 20 & 21 of SEBI	Resolution	Professional informed	
	(Listing	Professional the	that the records of board	
	Obligations and	Records of Board and	and committee minutes	*
	Disclosure	Committee minutes	and its related	·
	Requirements)	and its related	documents held till the	
	Regulations, 2015	documents held till the	date of CIRP were in	
		date of CIRP are in	custody of Economic	
		custody of Economic	Offences Wing.	
		Offences Wing and so	0.	a a
		we are unable to		
	1 .	comment on such		*
	4	compliances required		
		under the said		
		Regulations as the		*
		Supporting Documents		
				· ·





		to Acknowledge /		
	7	Substantiate the said		
		compliance of		
		Regulation 17 to 21 are		
		not provided to us for		
		verification.		
8.	Regulation 22 of	We are unable to	The Resolution	9
	SEBI (Listing	comment on such		
	Obligations and	compliances required		
	Disclosure	under the said		
	Requirements)	D 1		9
	Regulations, 2015	Regulations as Supporting Documents	1	
	Regulations, 2015		0 0	
17 1		/	regulation, hence the	
		Substantiate the said	r	
		compliance of	for audit purpose.	
	U.	Regulation 22 are not		
		provided.		
		The Resolution		,
		Professional informed		
9		that he was not made		
		available any of the		,
		documents/records		
		regarding the said		
		regulation, hence the		
		same were not		
		provided for audit		× ×
		purpose.		*
9.	Regulation 23 of	Policy on Related Party	The requisite	
	SEBI (Listing	Transaction is not		
	Obligations and	updated or modified or		TO THE STATE OF TH
	Disclosure	reviewed since	to the Resolution	
	Requirements)	01.10.2014.	Professional.	,
	Regulations, 2015			
10.	Regulation 23 of	Intimation of Related	The said delay caused	The Company has not yet intimated the
	SEBI (Listing	Party Transaction	due to non -availability	Related Party Transaction under
	Obligations and	under Regulation 23	of employees of	Regulation 23 for March, 2019,
	Disclosure	for March, 2019,	Compliance	September, 2019 and March, 2020
	Requirements)	September, 2019 and	Team/Senior	Quarter were not intimated to the Stock
	Regulations, 2015	March, 2020 Quarter	Management of the	Exchanges till date.
	riogalacions, 2015	were not intimated to	Company and also were	Exercinges till date.
		the Stock Exchanges till		
			not provided the	× ×
		date. The said delay	credentials of BSE and	•
		caused due to non -		
		availability of	Professional to do such	





,				,
		employees of	compliance on timely	
		Compliance	manner, as informed by	
		Team/Senior	Resolution Professional.	
		Management of the		*
		Company and also		
				×
		were not provided the		
		credentials of BSE and		
		NSE to the Resolution		
		Professional to do such		
		compliance on timely		*
		manner, as informed by		
		Resolution		s.
		Professional.		
11.	Regulation 24 of	100 mm	The resolution	
11.				
	SEBI (Listing	comment on such	professional informed	
	Obligations and	compliances required	that, subsidiaries are	
	Disclosure	under the said	separate corporate	
	Requirements)	Regulations as	entities and managed by	
	Regulations, 2015	Supporting Documents	the Board of Directors of	
	11 11	to Acknowledge /	the respective	
	*	Substantiate the said	companies. RP has time	
		compliance of	and again requested the	* 1
		Regulation 24 are not	Directors of the	
		provided.	subsidiaries to provide	
			•	7
			the details, but due to	
		separate corporate	non-availability of	
		entities and managed	relevant documents	
		by the Board of	from the subsidiary	
		Directors of the	companies, the same	,
		respective companies.	were not made available	*
		RP has time and again	to the auditor for	
		requested the	verification.	
		Directors of the		
	1	subsidiaries to provide		,
	5	the details.		
		The Resolution		
		Professional informed		
		that he was not made		w
		available any of the		*
	,	documents/records	,	
		regarding the said		
		regulation, hence the		
		same were not	N .	
	-	provided for audit		¥
		P. OTTAGE TOT GUUIT		





		purpose.		
12.	Regulation 25 of		The Company is	
12.	SEBI Listing	comment on such	1 7	_
	Obligations and	compliances required	0 0	*
	Disclosure	under the said		
	Requirements)		,	,
	Regulations, 2015	0	1	
	Regulations, 2015	Supporting Documents		,
	1	to Acknowledge /	Bankruptcy Code, 2016,	
		Substantiate the said	1	
		compliance of	1	
		Regulation 25 are not		
		provided.	Resolution Professional.	, ×
		The Company is		
	* * * * *	undergoing CIRP w.e.f.		
		20th August, 2019 and		
		in view of the same,		•
		pursuant to Section 17		9
		of Insolvency and		3
		Bankruptcy Code,		
		2016, the powers of the		
		Board are suspended		
		and shall be exercised		
		by the Resolution		
		Professional.		
13.	Regulation 26 of	We are unable to	The Resolution	_
	SEBI (Listing	comment on such	Professional informed	,
	Obligations and	compliances required	that he was not made	
	Disclosure	under the said	available any of the	
	Requirements)	Regulations as	documents/records	
	Regulations, 2015	Supporting Documents	regarding the said	
	9	to Acknowledge /	regulation, hence the	7
		Substantiate the said	same were not provided	*
		compliance of		
		Regulation 26 are not		
		provided.	ii .	*
	5	The Resolution		•
		Professional informed	= s	
		that he was not made		
		available any of the		
		documents/records		2
	2	regarding the said		
		regulation, hence the		
		same were not		
		provided for audit		,
		provided for addit		





		nı	urpose.		,
14.	Regulation 27 of	•		The said delay caused	
	SEBI (Listing		Report for the		
	Obligations and		December, 2019		
	Disclosure		Quarter was made	1	
	Requirements)		to BSE (Bombay		•
	Regulations, 2015			Company and also were	
	Regulations, 2015		22.01.2021 after the		
				credentials of BSE and	
	a a			NSE to the Resolution	
	<i>Y</i>		•	Professional to do such	
			0 ,	compliance on timely	•
			due date.	manner, as informed by	
				Resolution Professional.	
			Report for the	resolution i loiessional.	. *
			March, 2020		*
			Quarter was made		
			to BSE (Bombay		
	(2)		Stock Exchange)		
			and NSE (National		
			Stock Exchange) on		
			12.02.2021 after the		
			due date.		
		•	The said delay		
			caused due to non -		•
			availability of		
			employees of		-
			Compliance		
			Team/Senior		*
			Management of the		
			Company and also		
			were not provided		
			the credentials of		
			BSE and NSE to the		
			Resolution		*
			Professional to do		
			such compliance on		
			timely manner, as		,
			informed by		*
			Resolution		
			Professional.	9	
		•	As per the Ministry	8	
			of Commerce -		,
			Master Data and		•



View Signatory Details of the Company, Mr. Lalit Mohan Mehta (Non- Executive Independent Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR - 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the Composition of				
Details of the Company, Mr. Lalit Mohan Mehta (Non- Executive Independent Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR - 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	View Signatory			
Mohan Mehta (Non-Executive Independent Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	-			9
Mohan Mehta (Non-Executive Independent Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	Company, Mr. Lalit			
Executive Independent Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 03/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the		9 9		
Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the				×
Director), Mr. Raj Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	Independent			
Kumar Aggarwal (Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR - 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the		8	.6	
(Non-Executive Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019 and 27/09/2019 a				
Independent Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non- Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019 01/10/2019 and 27/09/2019, as per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the		*		
Director), Ms. Sandhya Baliga (Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR - 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the		1 99		
(Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the				
(Non-Executive Independent Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	Sandhya Baliga		*	
Director), Mr. Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the		95		
Hazari Lal (Non-Executive Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	Independent			
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Independent Director) have filed Form DIR – 11 - Notice of resignation of a director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	Hazari Lal (Non-			
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director to the Registrar and have resigned from the post of Independent Director as on 27/09/2019, 03/10/2019, 01/10/2019 and 27/09/2019. As per confirmation given by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the			*	
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by Resolution professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the				
professional, the COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the			2	
COC Members have not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the				
not accepted the said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	*			
said resignation in the COC Meetings and so the said Independent Directors are continued to be disclosed under the	not accepted the			
and so the said Independent Directors are continued to be disclosed under the				
Independent Directors are continued to be disclosed under the				
Directors are continued to be disclosed under the	and so the said			
continued to be disclosed under the	Independent			9
disclosed under the	Directors are			
	continued to be			
Composition of	Charles and Advisor Hardward Control		,	
	Composition of	F	,	





	,* >	Board and Committee under the quarterly compliance report on corporate governance as per		
		Regulation 27.		
15.	Regulation 30 of	Necessary disclosures	The requisite	
	SEBI (Listing	were made to the stock	documents/records	_
	Obligations and	exchange from time to	were not made available	
	Disclosure	time under the said	to the Resolution	
	Requirements)	regulation but there	Professional.	
	Regulations, 2015	has been delay in filing		,
		certain disclosure. The		
		policy for	**	·
		Determination of	9	
		materiality is not		
		available for		•
		verification and we are		
		unable to comment on		
	,	such compliances		j
	ji	required under the said		
	9	Regulations as		
		Supporting Documents		
		to Acknowledge /		
		Substantiate the said		,
* *		compliance of		
	•	Regulation 30 are not		
1.0	D l - 1' 21 - C	provided.	mi c	mi i i i i i i i i i i i i i i i i i i
16.	Regulation 31 of		The Company is under	The said compliance under the
	SEBI (Listing	holding of securities		regulation is not submitted till date as
	Obligations and Disclosure	and shareholding	Resolution Process	the Company is under Corporate
	Requirements)	pattern separately for each class of securities	(CIRP) and Payment to Depositories are not	Insolvency Resolution Process (CIRP) and Payment to Depositories are not
	Regulations, 2015	for September, 2019,	Depositories are not made due to non-	made due to non-availability of funds
	Regulations, 2015	December, 2019 and	availability of funds and	and so details relating to the said
		March, 2020 Quarter	so details relating to the	Regulation are not provided by NSDL
		are not submitted to	said Regulation are not	and CDSL to the Resolution
		the stock exchanges till	provided by NSDL and	Professional.
		date as the Company is	CDSL to the Resolution	
		under Corporate	Professional.	
		Insolvency Resolution	•	
		Process (CIRP) and		,
	*	Payment to		



		Depositories are not		
		made due to non-		¥-
		availability of funds		8
		and so details relating		
		to the said Regulation		
		are not provided by		, i
		NSDL and CDSL to the		
		Resolution		
			~	
4.57	D 1.1 00 C	Professional.		
17.	Regulation 33 of	The Statement of Cash		
	SEBI (Listing	Flows was not a part of		
	Obligations and	the financial results		
	Disclosure	submitted to the stock		i i
	Requirements)	exchanges for the half		
	Regulations, 2015	year ended on March,		2
		2019.		* A = -
18.	Regulation 33 of	• The Financial	The said delay caused due	
	SEBI (Listing	Results for the	to resignation of	
	Obligations and	September, 2019	Statutory Auditors and	
	Disclosure	Quarter was made		
	Requirements)	to BSE (Bombay		
	Regulations, 2015	Stock Exchange) &		
	regulations, 2015	NSE (National Stock		·
		12.04.2021 after the		
		due date.		
		• The Financial	Professional.	P
		Results for the		
		December, 2019		
	1	Quarter was made		
		to BSE (Bombay	-	
		Stock Exchange) &		a a
		NSE (National Stock		
		Exchange) on		,
160		12.04.2021 after the	9	A
		due date.		
		• The Financial		
	28	Results for the	L '	
		March, 2020		
		Quarter was made		
		to BSE (Bombay		
		Stock Exchange) &	٠.	·
		NSE (National Stock		
			* 1	
		Exchange) on		



				*
		28.04.2021 after the		
		due date.		
		• The said delay		
		caused due to	(40)	
	τ	resignation of		
1	,	Statutory Auditors	×	
		and non -		
		availability of		
		employees of	,	
		Compliance	•	
	10	Team/Senior		
		Management of the		
		Company, as	6	
	9	informed by		
		Resolution		
		Professional.		
19.	Regulation 34 &	Supporting Documents		,
	36 of SEBI (Listing	to Acknowledge /		
	Obligations and	Substantiate the said		1
	Disclosure	compliance of	8	
	Requirements)	Regulation 34 & 36 are		
222	Regulations, 2015	not provided.		
20.	Regulation 30 &	The Website of the		
	46 of SEBI (Listing	Company is not		
	Obligations and	maintained as per the		
	Disclosure	said Regulation 30 &		•
	Requirements)	46.	_	
	Regulations, 2015		*	
21.	Regulation 40 of	Intimation of		
	SEBI (Listing	Certificates under		
	Obligations and	Regulation 40 for	8	
	Disclosure	September, 2019 and	4	
	Requirements)	March, 2020 Quarter		
	Regulations, 2015	were not intimated to		
		the Stock Exchanges till		
	*	date.		
22.	Regulation 34 &	Format of Corporate		
	53 of SEBI (Listing	Governance Report		*
	Obligations and	as provided in	1	
	Disclosure	the Annual Report 19-		
	Requirements)	20 is not as per the		
8	Regulations, 2015	guidelines provided in	p.	
		Regulation 34 & 53.		
23.	Regulation 47 of	We are unable to		



25.	Regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015	30.05.2019 pursuant to conversion of warrants to Mr. Sarang Wadhawan, promoter of the Company are not provided.	employees of Compliance Team/Senior Management of the Company, as informed by Resolution			
2.1	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	comment on such compliances required under the said Regulations as Supporting Documents to Acknowledge / Substantiate the said compliance of Regulation 107 and related Regulations in respect of Allotment of Equity Shares in the Board Meeting held on		•		
24.	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	comment on such compliances required under the said Regulations as Supporting Documents to Acknowledge / Substantiate the said compliance of Regulation 47 are not provided.  We are unable to				





		due to non -availability of employees of Compliance Team/Senior Management of the Company, as informed by Resolution Professional.	*	
26.	Regulation 5 & 6		The said delay caused due	×
	of SEBI	comment on such		
	(Prohibition of	compliances required		
	Insider Trading) Regulations, 2015	under the said	1	
	Regulations, 2015	Regulations as Supporting Documents	,	
	,	to Acknowledge /		
		Substantiate the said		
		compliance of		*
	*	Regulation 5 & 6 are		
		not provided.		
		The said delay caused		
		due to non -availability		7
	4	of employees of		
100	* * *	Compliance		
		Team/Senior  Management of the		
		Company, as informed		
		by Resolution		
		Professional.		
27.	Regulation 7 of	We are unable to	The said delay caused due	
	SEBI (Prohibition		to non -availability of	
	of Insider	compliances required		
	Trading)	under the said	Compliance	
	Regulations, 2015	Regulations as	Team/Senior	
		Supporting Documents to Acknowledge /	Management of the Company, as informed	1
		Substantiate the said		
		compliance of	,	
		Regulation 7 are not		
		provided.		
		The said delay caused		
		due to non -availability		*
		of employees of	*	·
		Compliance		
		Team/Senior		





		Management of the					
		Company, as informed					
		by Resolution					
* .		Professional.					
28.	Regulation 8 & 9	We are unable to	The said delay caused due				
	of SEBI	comment on such	to non -availability of				
	(Prohibition of	compliances required	employees of			*	,
	Insider Trading)	under the said	Compliance				
	Regulations, 2015	Regulations as			X		
		Supporting Documents					*1
		to Acknowledge /					
		Substantiate the said	by Resolution				
		compliance of	Professional.				8
		Regulation 8 & 9 are					
		not provided.	T.				
		The said delay caused					
		due to non -availability					
		of employees of					
		Compliance					
		Team/Senior		2			
		Management of the					
		Company, as informed					
* ,		by Resolution			4		
		Professional.					
29.	Schedule B of SEBI	• The Intimation of					
	(Prohibition of	Closure of Trading					8
	Insider Trading)	Window Under for					
	Regulations, 2015	the March, 2019					
	4.	Quarter was made					6
		to BSE (Bombay					
	8	Stock Exchange) &	,				
		NSE (National Stock		4			
		Exchange) on					
		04.04.2019 after the					
		due date.					
		• The Intimation of					
	,	Closure of Trading					
		Window Under for				187	
		the June, 2019		×			
		Quarter was made					
		to BSE (Bombay					
		Stock Exchange) &					
	,	NSE (National Stock					
	2	Exchange) on	E	,			
	,	NSE (National Stock					





		04.07.2019 after the		
		due date.		*
30.	Schedule B of SEBI	Intimation of Closure of		
	(Prohibition of	Trading Widow were		*
	Insider Trading)	not intimated to the		
	Regulations, 2015	BSE (Bombay Stock		·
	, , , , , , , , , , , , , , , , , , , ,	Exchange) & NSE		
		(National Stock		. 1
		Exchange) for		,
		September, 2019,		
		December, 2019 and		
				*
21	Daniel FFA of	March, 2020 Quarter.	TI) C	The seid secondinate the
31.	Regulation 55A of		The Company is under	The said compliance under the
	SEBI	Reconciliation of Share	Corporate Insolvency	regulation is not intimated till date as
	(Depositories &	Capital Audit Report	Resolution Process	the Company is under Corporate
	Participants)	(55A) for September,		Insolvency Resolution Process (CIRP)
	Regulations, 1996	2019, December, 2019	Depositaries are not	and Payment to Depositories are not
		and March, 2020	made due to non-	made due to non-availability of funds
		Quarter were not		and so details relating to the said
		intimated to the Stock	0	Regulation are not provided by NSDL
		Exchanges till date as	said Regulation are not	and CDSL to the Resolution
		the Company is under	provided by NSDL CDSL	Professional.
		Corporate Insolvency	to the Resolution	,
	,	Resolution Process	Professional.	
	1,	(CIRP) and Payment to		*
	8	Depositaries are not		
		made due to non-		
		availability of funds, so		
		details relating to the		
я.		said Regulation are not		,
		provided by NSDL		
		CDSL to the Resolution	x ×	
	75	Professional.		
32.	Regulation 74 of	Intimation of	The said delay caused due	
	SEBI	certificate under	to non -availability of	
	(Depositories and	Regulation 74 for		
	Participants)	March, 2019 & June,	Compliance	
	Regulations, 2018	2019 Quarters are not	1	
	,	intimated to the Stock		
	*	Exchanges till date and		
		for September, 2019,		
		December, 2019 &		
		March, 2020 quarters		
	*	the said Certificate		
		January Sortmente	and the design of the same	





		were filed to the BSE	compliance on timely	
		(Bombay Stock	manner, as informed by	
		Exchange) & NSE	Resolution Professional.	
		(National Stock		
		Exchange) on		
		13.01.2021 and		
		29.01.2021 after the	5	
		due date.		
		The said delay caused		
		due to non -availability		,4
		of employees of		
		Compliance	8	
		Team/Senior		No. of the Control of
				a e e e e e e e e e e e e e e e e e e e
		Management of the	1	
		Company and also		
		were not provided the		
		credentials of BSE and		
		NSE to the Resolution		
		Professional to do such		
		compliance on timely		
		manner, as informed by		
		Resolution		* * *
		Professional.		
33.	Regulation 30(1)	Supporting Documents		,
	and 30(2) of SEBI	to Acknowledge /	Professional informed	
	(SAST)	Substantiate the said		
	Regulations, 2011	compliance of		
		Regulation 30 are not		
		provided.	regarding the said	*
			regulation, hence the	
		The Resolution	same were not provided	
		Professional informed	for audit purpose	8
	j.	that he was not made		
	8	available any of the		
		documents/records		
		regarding the said		
		regulation, hence the		
		same were not		
		provided for audit		*
	4	purpose.	2. 8	
34.	Regulation 31 of	We are unable to	The Resolution	
	SEBI (SAST)	comment on such	Professional informed	
	Regulations, 2011	compliances required	that he was not made	
		under the said	available any of the	
		·		L





		Regulations as	,	
		Supporting Documents	regarding the said	
	i	to Acknowledge /	regulation, hence the	a .
	B	Substantiate the said	same were not provided	
		compliance of	for audit purpose.	
			for addit purpose.	
		Regulation 31 are not		
		provided.		
		The Resolution		
	*	Professional informed	, •	
	e.	that he was not made	7 · · · · ·	
		available any of the		*
		documents/records		
				×
	*	regarding the said		
	* ,	regulation, hence the		
		same were not		
		provided for audit		,
		purpose.		4.
35.	SEBI Circular No.	We are unable to	The Resolution	
	CIR/CFD/CMD1/1	comment on such	Professional informed	
	14/2019 dated	compliances required	that he was not made	
	18" October, 2019.	under the said Circular		*
	10 October, 2017.			
		as Supporting		*
		Documents to	regarding the said	
		Acknowledge /	regulation, hence the	
	2	Substantiate the same	same were not provided	,
		are not provided.	for audit purpose.	, ,
				,
	, a.	The Resolution		
		Professional informed	¥	,
		that he was not made		
		available any of the		
				4
	9	documents/records		, ,
		regarding the said		
		regulation, hence the		
		same were not		· .
	8	provided for audit		
		purpose.		
36.	SEBI Circular No.	Intimation of		
	SEBI/HO/DDHS/C	Disclosure under the		
	IR/P/2018/144	said circular was made		v
	dated 26th	to the Stock Exchanges		
	November, 2018	on 23.05.2019 after the		
		due date.		×
		auc uate.		



	×		1	
37.	SEBI Circular No. CIR/CFD/CMD- 1/142/2018	Financial results for the September, 2019, December, 2019 & March, 2020 were filed with the stock exchange beyond the due date of filing the same and Detailed reasons for such delay were not was disclosed by RP in his report attached with financial results submitted to the Stock Exchanges.	disclosed by RP in his report attached with financial results	
38.	BSE Circular No.	Annual Report in XBRL		
	LIST/COMP/40/2 018-19 February 08, 2019	format is not filed to the Stock Exchanges for the Financial Year 18-19.		
39.	SEBI Circular No.		The Resolution	
	CIR/CFD/CMD/13 /2015 dated November 30, 2015 and Circular No. SEBI/HO/CFD/CM D1/CIR7 /P/2018/149 dated December 7, 2018 - &	comment on such compliances required under the said Circular as Supporting Documents to Acknowledge / Substantiate the same are not provided.  The Resolution Professional informed	that he was not made available any of the	
	Circular No. SEBI/HO/CFD/CM D1/CIR/P/2019/3 6 dated March 12, 2019 - Modification of circular dated December 7, 2018 on 'Disclosure of _ significant beneficial ownership in the	that he was not made available any of the documents/records regarding the said regulation, hence the same were not provided for audit purpose.		





	shareholding	,		
	pattern'			*
40.	CIR/CFD	We are unable to	The Resolution	
	/POLICYCELL/3/	comment on such	Professional informed	20 10 10 10 10 10 10 10 10 10 10 10 10 10
	2015 dated 05th	compliances required	that he was not made	
	August, 2015	under the said Circular	available any of the	
		as Supporting	documents/records	
		Documents to	regarding the said	, ,
		Acknowledge /	regulation, hence the	· ·
		Substantiate the same	same were not provided	
		are not provided.	for audit purpose.	*
		The Resolution		•
	В	Professional informed	2	
		that he was not made		
		available any of the		
	1	documents/records		
		regarding the said		
		regulation, hence the		
		same were not		
		provided for audit		
		purpose.		

#### Note:

- Pursuant to an order dated 20<sup>th</sup> August, 2019 of the National Company Law Tribunal (NCLT), Mumbai Bench, Corporate Insolvency Resolution Process (CIRP) has been initiated against M/s. Housing Development & Infrastructure Ltd ("The Company") as per Section 7 of the Insolvency and Bankruptcy Code, 2016.
- Mr. Abhay N. Manudhane, an insolvency resolution professional having Registration No. IBBI/IPA-001/IPP00054/2017-18/10128 was appointed as Interim Resolution Professional as per order of NCLT, and was further confirmed and appointed as Resolution Professional in the Second Meeting of the Committee of Creditor (COC) held on 08th January, 2020.





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Mr. Abhay N. Manudhane, the RP, during the CIRP Process has appointed us to carry out the
audit of the Company for the purpose of issue of Secretarial compliance report as required
under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015 for the corporate debtor for the financial year.

For, Keyur J. Shah and Associates

**Company Secretaries** 

Keyur J. Shah FCS No.: 9559 CP No.: 8814

UDIN: F009559C001719190

Place: Ahmedabad

Date: 10th December, 2021

**Note:** It is to be noted that due to lockdown and social distancing guidelines issued by the Ministry of Home Affairs for containment of spread of Covid-19, the abovementioned documents, registers, forms, etc. have not been physically verified by us, as being maintained by the Company at their office. While we have taken all possible steps to verify the records as made available to us by the Company through electronic medium and taken confirmation from the Company, wherever required but the audit was done subject to limitation of availability of documents.

\*[Disclaimer: This Report is prepared based on the information and explanation provided to us by Mr. Abhay N Manudhane, Resolution Professional, as were available with them. After initiation of CIRP process the Resolution Professional has taken reasonable steps to comply with compliances applicable to the company based on data available to them and the same was provided to us for the purpose of audit. Certain documents which could not be verified in course of audit as mentioned in this report is not available with Resolution Professional. Further, we are unable to verify/comment on the Committee of Creditor's minutes of the Company and other related documents of Corporate Insolvency Resolution Process, as not provided by the Resolution Professional due to the confidentiality issues. Hence, this report is prepared based on limitation of data.]