

July 13, 2023

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 Revised Annual Secretarial Compliance Report for the year ended March 31, 2023, under Regulation 24A of SEBI (LODR) Regulations, 2015.

This is concerning our letter dated May 26, 2023, where we submitted the Annual Secretarial Compliance Report (ASCR) for the Financial year ended March 31, 2023.

Please note that we received the Revised ASCR from the Practicing Company Secretary on July 11, 2023, late evening. The said Revised report is having the same date and UDIN i.e. May 25, 2023, and A035017E000381979 as the earlier filed ASCR. The reason for revision is mentioned in the note of Revised ASCR: "Due to oversight, there were some rectifications so this revised report has been submitted."

You are requested to kindly take on record the Revised Annual Secretarial Compliance Report.

Thanking you,

For SKIL Infrastructure Limited

Nilesh Mehta

MICOR

**Company Secretary** 



# Jaisal Mohatta & Associates Company Secretaries

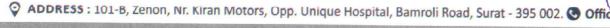
## Secretarial Compliance Report of SKIL Infrastructure Limited for the financial year ended on March 31, 2023

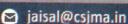
I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by SKIL Infrastructure Limited (hereinafter referred as 'the listed entity'), having its Registered Office at SKIL House, 209, Bank Street Cross Lane, Fort, Mumbai – 400023. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

### | Jaisal Mohatta Proprietor of Jaisal Mohatta & Associates have 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 March 31, 2023 ("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");
- (c) The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)
   Regulations, 2015;
- II. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements)
  Regulations, 2018; [Not Applicable as the Company has not issued any further share capital during the period under review];
- III. Securities and Exchange Board of India (Substantial Acquisition of Shares and Regulations, 2011;







- IV. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [Not Applicable as the Company has not issued any further share capital during the period under review];
- V. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; [Not Applicable as the Company has not issued any further share capital during the period under review];
- VI. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not Applicable as the Company has not issued any further share capital during the period under review];
- VII. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; [Not Applicable as the Company has not issued any further share capital during the period under review];
- VIII. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - IX. (The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; [Not Applicable as there was no reportable event during the period under review];
     X. Securities and Exchange Board of Latin (In the India)
  - X. Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009
     XI. Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009
- XI. Securities and Exchange Board of India (Depository Participant) Regulations, 2018 and circulars/ guidelines issued thereunder;

and based on the above examination, I/We hereby report that, during the Review Period:

I. (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)	or the southern	Devia	tions	Action Taken by	Type Action	of	Details of Violation	Fine Amo unt	Observati ons/ Re- marks of the Practicing Company Secretary		Re ma rks
	required is required to submit with a recognized stock(	of SEBI (LODR), 2015		the	BSE and NSE	Fine imposed Regulato NSE delayed Complian of Regulatio	l by or, for nce	submission of statement giving the numbers of	18% GST = Rs. 8260/-	was filed to Stock Exchange with delay of 7 days on	avoided in future.	(50 C)

	at the beginning	O.f	1.					inpully se	creidne	<u>S</u>
	the quarter, the		June 2022.		13(3) of SE	BI		T		
					(LODR),					
	received during				2015		ı			
	quarter, disposed									
	during the quar	ter								
	and those remaini									
	unresolved at the e	nd								
	of the quarter.				***************************************					
2.	Equity liste	d Regulat	There was	DCE						
	Company sha	II on 27(	a linere was		1110	s Delayed	in 12000	Disclosure	Delayed	+
	submit on quarterl	1   Of 27	2) delay in	1	imposed b	y submission	+ 189	was filed	tolshall k	oe
1	basis a corporate	0 (1000)	Blifiling of		Regulator,	of quarter	lyGST :	=Stock	avoided i	1
	dovernance remain	(LODK),	1		NSE fo		aRs.	Exchange	future	111
	governance report with the stock		Disclosure		delayed	corporate	14160/	1	1	
	3100		for the		Compliance					
	exchange.		Quarter		of	report.	each	of 5 days o	1	
			ended on		Regulation	Poport.	1	26 <sup>th</sup> Jul	У	
			June 2022.		27(2) of SEB		exchan	2022.		
					(LODR),	1	ge.			
					2015					
3.	Equity listed	Regulati	There was	DCE - I						
		on 31 o		BSE and	Fine was	Delayed ir	76000	Disclosure	Delayed	† <sub>-</sub>
	required to furnish	CEDI	1	NSE	imposed by	submission	+ 18%	was filed to	shall be	2
		1	filing of		Regulator,	of	GST =		avoided in	1
	. Stock	(LODR),	said		NSE for	statement	1	Exchange	future	
	-	2015	Disclosure		delayed	showing		for Quarter		
	quarterly basis a		for the		Compliance	holding of			1	
	statement showing		Quarter		of		1	Quarter 2		
	holding of		ended on		Disclosure		exchan			
	securities and		June 2022			shareholdin		,	1	
	shareholding		and		0.000	1	1	of 26 and 34		
	pattern separately		1 1			g pattern	1 1	days on 16 <sup>th</sup>	1	
	for each class of		September		ended on		i i	August 2022	1	
			2022.		June 2022			and 25 <sup>th</sup>		
	securities.				and			November		
					September		1 1	2022		
					2022 of			respectively.		
					Regulation					
					31 of SEBI		1			
					(LODR),					
					2015					
4.	A listed entity,	SEBI/HO/	There was	-		Delayed in	-	Disclosure	Delayed	
	identified as a LC					submission		was filed to	-	
	under the instant					of Initial				1
	framework, shall	1	Such						avoided in	
	make the	1-1-4				Disclosure		Exchange	future	
			Disclosure			of LC.	1		SOYATTA & A	33
	disclosures to the						ļ.	of 39 days	ANGER	7/3
	stock exchanges,							on 09th June	ACS-5501 COP-1609	7 NES
					4					
									OMONN'S SECRET	AR
										44.7 70

#### Jaisal Mohatta & Associates Company Secretaries

	where it	s	T							
	security(ies) ar							2022.		
	listed									
5.	Disclosures by listed entities of defaults or payment of interest/ repayment of principal amount on loans from banks / financial institutions and unlisted debt	D1/CIR/I f /2019/14 : 0	delay in filing of		-	Delayed submission of Disclosure for th Month ended o September 2022.	e	Disclosure was filed to Stock Exchange with delay of 3 days or 10 <sup>th</sup> October 2022.	avoided in future	1
6.	securities.  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).	on 14 of SEBI (LODR),	Company is yet to pay listing fees to BSE and NSE	-	-	Listing feet to BSE and NSE is yet to e paid.			future	
7.	Board of Directors	on 17 of SEBI (LODR), 2015	There was delay in appointme of Women Director	BSE and NSE	imposed by Regulator, NSE for	delay in Appointmen t of Women Director	Rs. 348100 /- by each exchan ge.	delay ins Compliance a	Delayed shall be avoided in future	-

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

Sr.	Compliance	Regulati	Deviations	Action	Type of	Details of	Fine	Ohaamati	D. 0	
No.	Requirement	on/		Taken	Action	Violation	Amo	Observati ons/ Re-	Manage	Re
	(Regulations/	Circular		by		Violation	unt	marks of		ma
	circulars/guideli	No.					unt	the	-	rks
	nes including								е	
	specific clause)							Practicing		
								Company		
								Secretary		
	The listed entity	_	Company	-	-	Company is	-	Listing fees	Delaved	
	shall pay all such	1	has not			yet to pay		for BSE and		
	fees or charges,		paid			listing fees		NSE is still	avoided in	
	as applicable, to		Listing fees			FY 2021-		payable	future	
	the recognised	2015	to BSE and			2022 to NSE				
	stock		NSE for			and BSE.				
1	exchange(s), in		2021-2022.							
- 1	the manner									
- 1	specified by the									
	Board or the									
- 1	recognised stock									
	exchange(s).									
2.	A listed entity is		1	BSE and	Fine was	Delayed in	7000 +	Disclosure	Delayed	-
			delay in	NSE	imposed by	submission	18%	was filed to	shall be	-
		1	filing of		Regulator,	of	GST =	JUCK 1	avoided in	
	submit with a	(LODR),	said		NSE and BSE	statement	Rs.	Exchange	future	
	recognized	2015	Disclosure		for delayed	giving the	8260/-	with delay		
	stock	ŀ	for the		Compliance	numbers of	by both	of 7 days on		
.	exchange(s), a		Quarter		of	investor	NSE	28 <sup>th</sup> April		
	statement		ended on		Regulation	complaints	and	2022 and		
	giving the		March		13(3) of SEBI		BSE	found Ok.		
	numbers of		2022.		(LODR),					
	investor				2015					
	complaints									
	pending at the									
	beginning of			-						
	the quarter,									
	those received									
	during the	-								
	quarter,									
	disposed of									
	during the									
	quarter and									
	those remaining								TTA 8 4	
	unresolved at				v			TOHA	132 CH	
	the end of the							SAISAL	S-35017	\
	quarter.								P-16090	igsqcup
								*COMPA	THE STATE OF THE S	**
								(A)	VYSECRE	

	7									
4.	Company shall submit on quarterly basis a corporate governance report with the stock exchange.  Equity listed companies are required to furnish with	SEBI (LODR), 2015 Regulation 31 of SEB (LODR),	is yet to filed Corporate Governance e report for Quarter ended on March 2022. There was	BSE and NSE BSE and NSE	imposed by Regulator, NSE and BSE for Non-compliance of Regulation 27(2) of SEBI (LODR), 2015  Fine was imposed by	submission of quarterly basis corporate governance report.  Delayed in submission of	+ 18% /GST = Rs. 106200 /- by both NSE and BSE  38000 + 18% GST =	Stock Exchange with delay of 47 days on 02 <sup>nd</sup> June 2022 and found Ok.  Disclosure was filed to Stock	avoided in future	
	stock exchange on quarterly basis a statement showing holding of securities and shareholding pattern separately for each class of securities.		Disclosure for the Quarter ended on March 2022.		for delayed Compliance of Regulation 31 of SEBI	showing holding of securities and shareholdin	44840/ - by both NSE	exchange with delay of 19 days on 10 <sup>th</sup> May 2022 and found Ok.		
5.		30 of SEBI (LODR),	There was delay of 6 days for submission of Intimation.	-		Company has delayed the Intimation of demise of Mr. Alexander John Joseph Non- Executive Independen t Director of the Company.		was filed to Stock Exchange with delay of 6 days and found Ok.	TA E 450	
								ACS COP	-35017 -16090	

Disclosures by SEBI   There was   Delayed in submission of Quarterly disclosure		In: I	lass:	1			7				
defaults on payment of interest/ cIR/P/201 Disclosure of FD/CMD1/Quarterly disclosure for all quarters provided in were delayed for provided in pursuant to provided in were for majority of months provided in were delayed for months filling of payment of provided in pursuant to provided in were delayed for months filled and pursuant to provided in were for majority of months pursuant to provided in were delayed for months filled and pursuant to provided in were for majority of the majority of the majority of the majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months.  8. Listed entity, its purpose for majority of the months purpose for majority of the months.  8. Li	0.	,	1		-			-			
payment of D/CMD1/Q (autrety) of ED/CMD1/Q (autrety) of EB/CMD1/Q (a			1	,					Disclosures	snall be	
interest/ repsyment of p/14/0 as per C2 principal amount on loans from 21, 2019 banks / financial institutions and unlisted debt securities.  7. Disclosures by listed entities of defaults on SEBI/HO/C ling of PD/CMD1/ minterest/ Circular of PD/CMD1/ binterest/ Circular of PD/CMD1/ circu		ł.					,		1	future	
ropsyment of principal amount on loans from 21, 2019 SEBI/HO/C SEBI/HO/CF DI/CMD1/CI R/P/2019 All of all institutions and unlisted debt securities.  7. Disclosures by SEBI There was delay in defaults on SEBI/HO/C filling of payment of principal dated C1(a) of principal amount on loans from banks / financial institutions and unlisted debt SEBI/HO/C filling of principal dated C1(a) of principal				,		S			were	latare	
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amount on loans from 21, 2019   SEBI/HO/C   Disclosures by SEBI   There was listed entities of Circular   Dayment of PD/CMD1/ GIR/P/2019   Circular   Disclosures by SEBI   There was   Disclosures by SEBI   There was   Disclosures   Disclosure   Disclosure							Quarters		tiled and		
loans from 21, 2019 SEBI/HO/C Banks / financial institutions and unlisted debt securities.  7. Disclosures by SEBI There was delay in defaults on SEBI/HO/C IR/P/2010 for majority of payment of FD/CMD1/ Interest/ CIR/P/2010 as per principal dated C1(a) of amount on November SEBI loans from banks / financial institutions and unlisted debt SEBI/HO/C Disclosure repayment of PD/CMD1/ Monthly interest/ CIR/P/2010 for majority of banks / financial institutions and unlisted debt CIR/P/2019 dated C1(a) of amount on November SEBI loans from banks / financial institutions and unlisted debt CIR/P/2019 defaults on SEBI/HO/C Disclosure repayment of PD/CMD1/ Monthly disclosure delayed of months pursuant to SEBI/HO/C D/CMD1/ R/P/2019/14 O dated nullisted debt CIR/P/2019 detail institutions and unlisted debt CIR/P/2019 detail institutions and unlisted debt CIR/P/2019 detail institutions and unlisted debt CIR/P/2019 detail is very to majority of the majority of the majority of the majority of the months.  8. Listed entity, SEBI/HO/D The happing and initial initial initial initial initial of LC to Stock exchanges, where its security (jes) are listed security (jes			110000000000000000000000000000000000000				pursuant to		found Ok.		
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Quarters of PY 21-2022  7. Disclosures by listed entities of defaults on payment of payment of principal amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, securities.  8. Listed entity, lightly large Corporate ("LC") under the instant ("LC") under the instant framework, shall make the disclosures to Stock exchanges, where its security (ies) are listed  Quarters of PY 21-2022  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  21, 2019  22, 2019  22, 2019  22, 2019  23, 2019  24				/140 for all			0 dated				
7. Disclosures by IsEBI There was delay in defaults on SEBI/HO/C filling of payment of FD/CMD1/ Monthly interest/ CIR/P/201 Disclosure for majority of months principal amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a DHS/CIR/P Company Large Corporate ("ILC") under the instant framework, shall make the of LC to disclosures to the stock exchanges, where its security (ies) are listed		securities.		the			November			-41	
7. Disclosures by listed entities of defaults on payment of payment of principal amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the of LC to disclosures to the stock exchanges, where its security (fes) are listed entity, listed enti				Quarters of			21, 2019				
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interest/ CIR/P/201 Disclosure as per principal dated C1(a) of amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a DHS/CIR/P Company Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  interest/ CIR/P/201 Disclosure as per principal delayed of months filed and pursuant to SEBI Circular SEBI/HO/CF D/CMD1/CIR/P/2019/14 DO dated P/CIR/P/2019/14 DO dated November 21, 2019  Disclosure of LC to delayed filed and pursuant to SEBI/HO/CF D/CMD1/CIR/P/2019/14 D/CIR/P/2019/14		payment of	FD/CMD1/	Monthly			1			future	
repayment of principal dated C1(a) of amount on loans from loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  repayment of 9/140 as per of months filled and pursuant to SEBI/HO/CF burshorts filled and found Ok.  SEBI/HO/CF D/CMD1/CI R/P/2019/14 O/CIR/P/2019/14 O/CIR		1									
principal amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  principal adated C1(a) of November SEBI pursuant to SEBI Circular SEBI/HO/CF D/CMD1/CI RSP/2019/14 O dated November 21, 2019  Disclosure SEBI/HO/CF D/CMD1/CI RSP/2019/14 O dated November 21, 2019  Disclosure between the SEBI/HO/D The DHS/CIR/P Company has not made Initial Disclosure of LC to Stock Exchanges.  Delayed was filed to shall be avoided in future with delay of LC to Stock Exchanges.  Exchanges.  Disclosure of LC to Stock Exchanges.  Exchanges.  SEBI/HO/CF D/CMD1/CI RS/P/2019/14 O dated November 21, 2019  Disclosure was filed to Stock Exchange of LC to Stock of 38 days on 9th June 2022 and found Ok.							1 - 1				
amount on loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed    Movember   SEBI   SEBI Circular   SEBI/HO/CF   D/CMD1/CI   R/P/2019/14   O dated   November   Disclosure   Delayed   November   21, 2019				1							
loans from banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to disclosures to disclosures to the stock exchanges, where its security (ies) are listed    SEBI/HO/C   D/CMD1/CI   R/P/2019/14   O dated   November   Disclosure   Delayed   November   Disclosure   November   Di							ľ		tound Ok.		
banks / financial institutions and unlisted debt securities.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed    banks / financial institutions and unlisted below the process of the							1				
institutions and unlisted debt securities.    FD/CMD1/ CIR/P/2019		1									
unlisted debt securities.  CIR/P/2019 / 140 for the majority of the majority of the months.  8. Listed entity, SEBI/HO/D The - Company has not large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  Listed entity, SEBI/HO/D The - Company has not made Initial Disclosure of LC to shall be avoided in future with delay stock exchanges.  Delayed was filed to shall be avoided in future with delay stock of 38 days on 9th June 2022 and found Ok.		1									
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majority of the months.  8. Listed entity, identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  majority of the made listed  - Company - Disclosure was filed to shall be avoided in future  made Initial Disclosure of LC to with delay of 38 days on 9th June 2022 and found Ok.		securities.					1				
the months.  8. Listed entity, identified as a DHS/CIR/P Company is yet to ("LC") under the instant framework, shall make the disclosures to the exchanges, where its security (ies) are listed  the months.  - Company - Disclosure was filed to shall be avoided in future  made Initial Stock Exchange with delay of LC to with delay of 38 days on 9th June 2022 and found Ok.							21, 2019				
months.  8. Listed entity, SEBI/HO/D The - Company identified as a DHS/CIR/P Company Large Corporate /2018/144 is yet to ("LC") under the instant Initial Disclosure instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed    Months.				majority of							
8. Listed entity, identified as a DHS/CIR/P Company identified as a Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed  Listed entity, identified as a DHS/CIR/P Company has not made Initial stock was filed to shall be avoided in future was filed to shall be avoided in future with delay of LC to Stock of 38 days on 9th June 2022 and found Ok.											
identified as a Large Corporate Large Corporate ("LC") under the instant framework, shall make the disclosures to the stock exchanges, where its security (ies) are listed   identified as a DHS/CIR/P Company  has not made Initial Stock avoided in future  made Initial Disclosure of LC to with delay Stock of 38 days  Stock Exchanges.  Stock Exchanges.  Exchanges.  has not made Initial Stock avoided in future  Exchange Exchange  Exchange Mays of 38 days  on 9th June  2022 and  found Ok.				months.							
Large Corporate /2018/144 is yet to ("LC") under the instant Initial Disclosure instant Initial Disclosure Initial Initial Disclosure Initial Disc	8.	Listed entity,	SEBI/HO/D	The	-	-	Company				
Large Corporate 72018/144 is yet to ("LC") under the instant Initial Disclosure instant Initial Disclosure of LC to with delay framework, shall make the of LC to disclosures to disclosures to the stock exchanges, where its security (ies) are listed Initial Disclosure of LC to with delay of 38 days on 9th June Exchanges. On 9th June 2022 and found Ok.		identified as a	DHS/CIR/P	Company						shall be	
instant   A   make   Disclosure   A   with delay   with delay   of LC to   with delay   of Stock   of 38 days   of LC to   on 9th June   disclosures to   the stock   exchanges,   where its   security (ies) are   listed   Listed		Large Corporate	/2018/144	is yet to					Stock	1	
framework, shall make the of LC to disclosures to the stock exchanges, where its security (ies) are listed  Disclosure  Of LC to Exchanges.  Stock Exchanges.  ACS-35017  COP-16090		("LC") under the	А	make			1		Exchange		
make the disclosures to the stock exchanges, where its security (ies) are listed		instant		Initial			of LC to		-	1	
disclosures to the stock Exchanges.  exchanges, where its security (ies) are listed  Stock  Exchanges.  2022 and found Ok.		framework, shall		Disclosure			Stock			1	
the stock exchanges.  exchanges, where its security (ies) are listed  Exchanges.  found Ok.  ACS-35017		make the		of LC to			Exchanges.		on 9 <sup>th</sup> June		
the stock exchanges.  exchanges, where its security (ies) are listed  Exchanges.  found Ok.		disclosures to		Stock					2022 and		
exchanges, where its security (ies) are listed  exchanges, where its cop-16090				Exchanges.					found Ok.		
where its security (ies) are listed											
security (ies) are listed		-							16	HATTA CHISSO	
listed SACS-33010 (COP-16090)		0.0000.000					,		IL M	147	到
									AISA	COP-16090	ES+
CADANY SECRETA	L		<u></u>						1		\$
									10	MANY SECRETA	

CRETARIES

9.	Submission	o.f	Pogulation	Thora			Т —						
"	Disclosure		Regulation 31 o	1	was	-		-		in-	Said	Delayed	-
	1			fdelay	in				submission	1	disclosure	shall b	е
	terms of	2FRI			aid				of		was filed t	oavoided i	n
	(Substantial		2011	disclosure	2				disclosure		Stock	future	
	Acquisition	of		for					for		Exchange		
	Shares	and		Invocation					Invocation		with dela	V	
	Takeovers)			of shares	of				of shares	of	of	3	
	Regulation,			Promoter					Promoter		Months. an		
	2011			Sudipan					Sudipan		found Ok.		
				Bhaduri,	Jay				Bhaduri, Ja				
				Mehta,					Mehta,	1			
	-			Ketan Sh	ah,				Ketan Sha	n.l			
				Trustees	of				Trustees o	1			
				FDLL Tru	st.	1			FDLL Trus				
				Shares we	ere				Shares wer	1			
				invoked	on				invoked o	n			
				07/04/202	1				07/04/2021				
10.	Composition	of	Regulation	Company	BS	E and	Fine	was		s 450000	There was	Delayed	-
	Board	of	17 of SEBI	is yet t	0 1	NSE	impo	sed by		n + 18%		shall be	
	Directors		(LODR),	appoint					1	1	Compliance	avoided in	1 1
			2015	Women		1	_	1.5	t of Wome		of said	future	
				Director					Director		regulation.		
				after		1		oliance	Director	/- by			
				resignatio	,	1	of	onance		both			
				of previou	- 1	1		lation		NSE			
				Director.	1	1	_	of SEBI		and			
				Director.			(LOD			BSE			
						1	2015			DSL			
							2013						
											<u> </u>	<u> </u>	

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while appointing/re	-appointing an aud	itor Risk ACO
			ON 1609

			-
2.	If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.  Other conditions relating to resignation of statuters and the such such such such such such such such		It was noted that there was appointment of a new Statutory auditor during the period under review on completion of the term of previous Auditor
2.	Other conditions relating to resignation of statutory auditor  Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	It was noted that there was appointment of a new Statutory auditor during the period under review on completion of the term of previous Auditor
	In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.  The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.  ii. Disclaimer in case of non-receipt of information:		SOLATTA & A
3.	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.  The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as	NA	It was noted that there was

specified	in Annex	uro A	in	CEDI	C: 1				
1 '	1 D.			SEBI	Circular	CIR/	2	appointme	nt of
CI D/CIVID I,	/114/2019 d	ated 18"	Jctobe	er, 2019.			-	a new Stat	utory
								auditor dur	ing
								the p	eriod
								under revie	w on
								completion	of
								the term	of
								previous	
	***************************************						-	Auditor	

### III. I hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	NA
2.	<ul> <li>Adoption and timely updation of the Policies:</li> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations / circulars / guidelines issued by SEBI</li> </ul>	Yes	NA
3.	<ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website.</li> </ul>	Yes	NA
4.	Disqualification of Director:  None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	NA NA NOHATTA

			company Secretai
5.	Details related to Subsidiaries of listed entities ha		
	been examined w.r.t.:		NA
	Identification of material subsidiary companies Disclosu	ıre	
	requirement of material as well as other subsidiaries		
6.	Preservation of Documents:		
	The listed entity is preserving and maintaining record		NA
	as prescribed under SEBI Regulations and disposal a	٤	
	records as per Policy of Preservation of Documents and	1	
	Archival policy prescribed under SEBI LODR Regulations	4	
	2015.	'	
7.	Performance Evaluation:		
	The listed entity has conducted performance evaluation	Yes	NA
	of the board, independent Directors and the Committees	1	
	at the start of every financial year/during the financial		
	year as prescribed in SEBI Regulations.		
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of	Yes	NA
	AuditCommittee for all related party transactions; or		
	(b) The listed entity has provided detailed reasons		
	along with confirmation whether the transactions		
	were subsequently approved/ratified/rejected by		
	the Audit Committee, in case no prior approval		
	has been obtained.		
9.	Disclosure of events or information:	N/	
	The listed entity has provided all the required disclosure(s)	Yes	NA
	under Regulation 30 along with Schedule III of SEBI		
	LODR Regulations, 2015 within the time limits prescribed		
	there under.		
10.	Prohibition of Insider Trading:	Yes	NA
	The listed entity is in compliance with Regulation 3(5) &	163	INA
	3(6) SEBI (Prohibition of Insider Trading) Regulations,		
	2015.		. Α
11.	Actions taken by SEBI or Stock Exchange(s), if any:	No	NSE has acted
	No action(s) has been taken against the listed entity/		against Company
	its promoters/ directors/ subsidiaries either by SEBI		for delayed
	or by Stock Exchanges (including under the Standard		Compliance of
	Operating Procedures issued by SEBI through various		Regulation 17, 27(2),
	circulars) under SEBI Regulations and circulars/		13(3) and 31 of SEBI
	guidelines issued thereunder except as provided under		LODR, 2015.
	separate paragraph herein (**).		
12.	Additional Non-compliances, if any:	No	Company has
	No additional non-compliance observed for any SEBI		delayed the
	regulation/circular/guidance note etc.	WOHATTA & AGO	Compliance of
		(\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Circular
		ACS-35017 P	SEBI/HO/DDHS/CIR/
	·	SECRETARIES SECRETARIES	
		SECRETARILE	
		14011	

- 1		
		P/2018/144 and
1		SEBI/HO/DDHS/CIR/
1		P/2018/144 of SEBI
		w.r.t LC under the
		instant framework
		and Monthly
		Disclosures of
		defaults on payment
		of interest/
		repayment of
		principal amount on
		loans for the Month
l		ended on
		September 2022.
_		respectively.

This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Jaisal Mohatta & Associates

Company Secretaries

ICSI Identification No.: \$2016GJ378500

(Jaisal Mohatta)

Proprietor

ACS - 35017, COP - 16090

Peer Review Certificate No. 2372/2022

Surat, May 25, 2023 UDIN: A035017E000381979

Note: Due to oversight, there were some rectification so this revised report has been submitted.