

NEWTIME INFRASTRUCTURE LIMITED

CIN No.: L24239HR1984PLC040797

Regd. Off.: Lotus Green City, Sector 23 & 24 Bhiwadi, Alwar Bypass, 75 Mtr. Road, Daruhera, Rewari-123401

Phone: 91-7419885077, Email: newtimeinfra2010@gmail.com

Website: www.newtimeinfra.in

Ref No.: NIL/BSE/2021

Date: 30th June, 2021

To,
The Manager
BSE Limited,
Corporate Relationship Department
Phirozee Jeejee Bhoy Towers,
Dalal Street,
Mumbai-400001

BSE SECURITY CODE: 531959

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019, Please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2021.

This is for your information and records.

Thanking you,

Thanking You
Yours Faithfully
For **Newtime Infrastructure Limited**

R KANIKA
KAPUR

Digitally signed by R
KANIKA KAPUR
Date: 2021.06.30
18:47:35 +05'30'

RAJIV KAPUR KANIKA KAPUR
Director
DIN: 07154667

S. Khurana & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF NEWTIME INFRASTRUCTURE LIMITED For the year ended 31st March, 2021

Entity Name : Newtime Infrastructure Limited
CIN : L24239HR1984PLC040797
Registered Address : Lotus Green City Sector – 23 & 24, Bhiwadi Alwar Bypass,
75 Mtr. Road, Dharuhera, Rewari, Haryana - 123401

I, Sachin Khurana, Practicing Company Secretary of S. Khurana and Associates have examined that:

- All the documents and records made available to us and explanation provided by **NEWTIME INFRASTRUCTURE LIMITED** (“the listed entity”),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;- **Company has not issued any type of Security during the reporting period.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable as the Company has not bought back any of its Securities.**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Company has not issued any debt security during the reporting period.**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable.**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (other regulations as applicable) and circulars/ guidelines issued thereunder;



I, **Sachin Khurana**, hereby report that, during the Review Period:

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

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Action Taken	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 14: Fees and other charges to be paid to the recognized Stock Exchange(s)	Delayed Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	<i>The Annual Listing Fees (ALF) has not been paid by the company</i>
2.	Regulation 31: Shareholding Pattern for the Quarter Ended March 2020	Delayed Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	<i>Filed with delay of 58 days</i>
4.	Regulation 33(3)(a): Financial Results Quarter Ended December 2020	Delayed Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	<i>Filed with delay of 1 day</i>
5.	Regulation 23(9): Submission of disclosure on Related party transactions Half Year Ended September 2020	Delayed Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	<i>Filed with delay of 59 day</i>



6.	Regulation 23(9): Submission of disclosure on Related party transactions Half Year Ended March 2020	No Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	No filing for the Half Year Ending March
7.	Regulation 33(3)(d): Financial Results Year Ended March 2020	Delayed Submission	<i>As per the information provided by the listed entity, since the company is suspended for various non-compliances, no penalty notice was received</i>	Filed with delay of 6 days

**Company has delayed the payment of Annual Listing Fee along with the arrear in interest because of which the Stock Exchange has suspended the listed entity and company was not receiving penalty notices for various non-compliances.*

(b) The listed entity has generally maintained records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.

(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

S. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations! remarks of the Practicing Company Secretary, if any.
1	Stock Exchange	Regulation 14-Fees and other charges- Failure to pay the arrears of Annual Listing Fees	Fees Not paid	Company has been suspended on BSE for trading in securities further resulting in freezing of demat account of promoters and promoters' group

**The Listed Entity has defaulted in payment of Annual Listing Fee on time because of which the listed entity is suspended from BSE.*

**As informed by the Listed Entity has been suspended on Stock Exchange for long due to which, no penalty notice for the non-compliances were received*



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

S. No.	Observations of the Practicing Company Secretary for previous Years	Observation made in the Secretarial Compliance Report for the year ended March 31, 2020	Action Initiated	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 14: Fees and Other Charges to be paid to the Stock Exchange for the financial year 2019-2020, 2018-19, 2017-18, 2016-17	Annual Listing Fees has been paid after the expiry of due date.	As informed the company has paid the Annual Listing Fee	The Annual Listing Fees (ALF) has been paid to stock exchange after the expiry of due date.
2.	Regulation 6 (1): Appointment of Company Secretary	The Company had not appointed the Whole - Time Company Secretary as the Compliance Officer	Company has appointed the whole-time Company Secretary	Appointment was made on February 15, 2021
3.	Regulation 31: Shareholding Pattern for the Quarter Ended March 2019	Delayed Submission	Shareholding pattern was submitted by the company on April 30, 2019	There was a delay of 8 days in submission to Stock Exchange
4.	Compliance pursuant to Regulation 40(9) & 40(10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the Half Year ended 31 st March, 2019	Delayed Submission	Compliance Certificate from Practicing Company Secretary was submitted by Company on May 6, 2019	There was delay of 6 days in submission of Certificate to Stock Exchange



5.	Regulation 31: Shareholding Pattern for the Quarter Ended June 2019	Delayed Submission	Shareholding pattern was submitted by Company on July 23, 2019	There was a delay of 2 days in submission to Stock Exchange
6.	Regulation 7(3): Half Year Ended September 2019 Compliance Certificate Maintaining Physical or Electronic Transfer Facility	Delayed Submission	Certificate under Regulation 7(3) was submitted by the Company on November 4, 2019	There was a delay of 4 days in submission to Stock Exchange
7.	Regulation 31: Shareholding Pattern for the Quarter Ended September 2019	Delayed Submission	Shareholding pattern was submitted by Company on October 30, 2019	There was a delay of 9 days in submission to Stock Exchange

Due to restricted movement amid COVID-19 pandemic, we have conducted online verification & examination of records and other documents of the Company, as facilitated by the Company, for the purpose of issuing this Report.

For S. Khurana & Associates
Company Secretaries
FRN: I2014DE1158200
Peer Review No. 804/2020

S. Khurana
29/06/2021

Sachin Khurana
Proprietor
M. No.: F10098; CP No.:13212
UDIN - F010098C000544027



Date: 29/06/2021
Place: New Delhi