

**SADHNA BROADCAST LIMITED**  
**[Formerly known as Chirau Broadcast Network Limited]**

CIN: L92100DL1994PLC059093

Date: 30/05/2019

To,

Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001

Metropolitan Stock Exchange Of India Limited  
Vibgyor Towers, 4<sup>th</sup> Floor, Plot No. C 62,  
G Block, Opp. Trident Hotel, Bandra Kurla  
Complex, Bandra (E), Mumbai – 400098, India

**Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended on 31<sup>st</sup> March, 2019.**

Dear Sir/Madam,

In compliance with the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we hereby submit Annual Secretarial Compliance Report for the Financial Year ended on 31<sup>st</sup> March, 2019 issued by V kumar and Associates, Company Secretaries.

This is for your kind information and taking on record please.

Thanking You.

For and on behalf of

**Sadhna Broadcast Limited**

  
**Geetanjali Malhotra**  
Company Secretary & Compliance Officer  
M.No. A44922

Registered Office: 37, Second Floor, Rani Jhansi Road, Motia Khan, Paharganj, Delhi- 110055

Email ID: [cbnl.delhi@gmail.com](mailto:cbnl.delhi@gmail.com), Website: [www.sadhnabroadcast.com](http://www.sadhnabroadcast.com)

Phone: 91-11-23552627, Fax No.: 91-11-23524610



# V KUMAR AND ASSOCIATES

Company Secretaries

15/18, Basement, West Patel Nagar, New Delhi-110008  
Ph. : +91-11-2588 5492, M. : +91-99102 18035  
E-mail : csvivekkumar@gmail.com

Ref. No.

Date .....

## Secretarial Compliance Report of Sadhna Broadcast Limited for the year ended 31<sup>st</sup> March, 2019

I Vivek Kumar, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Sadhna Broadcast 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 31<sup>st</sup> March, 2019 in respect of compliance with the provisions of:

- (1) the Securities and Exchange Board of India Act, 1992 ("SEBI ACT") and the Regulations, circulars, guidelines issued there under; and
- (2) the Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI"); including
  - (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;
  - (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulations 2018;
  - (c) Securities and Exchange Board of India (Substantial Acquisition of shares and Takeovers) Regulations, 2011;
  - (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
  - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
  - (g) Securities and Exchange Board of India (Prohibition of Insider Trading ) Regulations, 2015;

*Vivek Kumar*

(h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013.

(i) and circular/guidelines issued thereunder;

and based on the above examination, I hereby report that, during the review period:-

(a) The listed entity has complied with the provisions of the above Regulations and Circular/guidelines issued thereunder, except:-

S.No	Compliance Requirement	Deviations	Remarks of PCS
1	Regulation 19(1) & 19 (2) of SEBI (LODR) Regulations 2015	Non Compliance in Composition of Nomination and Remuneration Committee	Clarification was given by the Company to the Stock Exchange that it was a typographical error, Due to which BSE waived off the penalty which was earlier imposed.

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

(c) The following are the details of actions taken against the listed entity 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	Remarks of PCS
1.	Bombay Stock Exchange (BSE)	Non Compliance of Regulation 19(1) & 19 (2) of SEBI (LODR) Regulations 2015	Penalty of Rs. 217120/- was imposed by the BSE via letter dated 31 <sup>st</sup> Jan, 2019	Clarification was given by the Company to the Stock Exchange that it was a typographical error, Due to which BSE waived off the penalty which was earlier imposed.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable as this Secretarial Compliance Report is being issued first time

Date: 30.05.2019

Place: New Delhi



Signature

V Kumar and Associates

FCS No: 8976

CP No: 10438

(Vivek Kumar)