

May 30, 2023

To,
The Manager - CRD,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001
Scrip No. 530943

The Manager - Listing Department, National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Symbol - SABTN

Dear Sir(s),

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023.

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations") read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, enclosed herewith the Annual Secretarial Compliance Report issued by M/s. Shweta Mundra & Associates, Practicing Company Secretary, for the year ended March 31, 2022.

Kindly take the same on record.

Thanking you.

Yours faithfully, For Sri Adhikari Brothers Television Network Limited

Kajal Pandey Company Secretary & Compliance Officer ACS No. 69492

Encl.: A/a

(Sri Adhikari Brothers Television Network Limited is under corporate insolvency resolution process pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. With effect from December 20, 2019, its affairs, business and assets are being managed by, and the powers of the board of directors are vested in the Resolution Professional, Mr. Vijendra Kumar Jain, appointed by Hon'ble National Company Law Tribunal, Mumbai Bench, vide order dated December 20, 2019).

CIN: L32200MH1994PLC083853

Shweta Mundra & Associates

Practicing Company Secretaries

Office Address: B - 202, Chandrakant Residency, 150 Feet Road, Near Maxus Mall, Bhayander (W), PIN- 401 101 (INDIA), Tel No. 7021723346, Email: csshwetamundra@gmail.com

Secretarial Compliance Report

of Sri Adhikari Brothers Television Network Ltd. for the year ended 31st March 2023

[pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019]

To,
The Members,
Sri Adhikari Brothers Television Network Limited,
Oberoi Chambers, 6th Floor,
Oberoi Complex, Next to Laxmi Industries Estate,
Oshiwara- New Link, Andheri West, Mumbai-400053,
Maharashtra, India.

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Sri Adhikari Brothers Television Network Limited [having Corporate Identification Number L32200MH1994PLC083853 and whose equity shares are listed at BSE Limited ('BSE') and National Stock Exchange of India Limited ('NSE') with Scrip Code/Symbol of "530943" and "SABTN" respectively], (hereinafter referred as 'the listed entity'), having its Registered Office at Oberoi Chambers, 6th Floor, Oberoi Complex, Next to Laxmi Industries Estate, Oshiwara- New Link, Andheri West, Mumbai-400053, Maharashtra, India. 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 our random 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, we 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:

We, Shweta Mundra & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Sri Adhikari Brothers Television Network Limited [having Corporate Identification Number L32200MH1994PLC083853 and whose equity shares are listed at BSE Limited ('BSE') and National Stock Exchange of India Limited ('NSE') with Scrip Code/Symbol of "530943" and "SABTN" respectively],
- (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 SHWETA MUNDRA & ASSOCIATES

for the year ended 31st March 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");

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 (herein with referred to as 'LODR');
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (No compliances were required to be made during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (No compliances were required to be made during the review period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (No compliances were required to be made during the review period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (No compliances were required to be made during the review period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;and circulars/guidelines issued thereunder;

Based on the above examination, we hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

BRIEF ABOUT THE LISTED ENTITY:

Sri Adhikari Brothers Television Network Limited ("The Company") is currently under Corporate
Insolvency and Resolution Process (CIRP) vide the Order no. CP (IB)-2045/MB/2018, dated 20th
December, 2019, by the Hon'ble NCLT Mumbai Bench. The Hon'ble NCLT Mumbai Bench has
appointed Mr. Vijendra Kumar Jain as the Interim Resolution Professional (RP) for the Company.
Subsequently, Mr. Vijendra Kumar Jain was appointed as the Resolution Professional by the
Committee of Creditors in the meeting held on 15th January, 2020.

ACS Shweta Mundra Mem - A38115 COP - 15387 Thereafter, the CoC approved the liquidation of the Company in the 21st CoC meeting held on 24th August, 2021. Accordingly, an application was filed before Hon'ble NCLT for approval of the liquidation of the Company. The Tribunal passed an order for liquidation on 16th December, 2021. Further, an application for rectifying the Liquidator's name was filed before the Hon'ble NCLT. The Hon'ble Tribunal passed another other on 4th January, 2022 (received on 21st January, 2022) appointing Mr. Ashish Vyas as the Liquidator.

Thereafter, the Hon'ble NCLAT passed an order dated 31st January, 2022, based on an appeal filed by suspended management, staying the liquidation order and directing that a Resolution plan received from M/s. SAB Events & Governance Now Media Ltd and M/s. Marvel Media Pvt Ltd with Mr. Ravi Adhikari and Mr. Kailasnath Adhikari be placed for consideration of the CoC Members with additional 2 Resolution Applicants. Thereafter, the matter was disposed of on 12th October 2022. Pursuant to the NCLAT Order, the Resolution Professional presented the Resolution Plan from the suspended management to the COC, which was then approved by the COC and is currently filed with NCLT for consideration.

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.	-	The powers of the Board of Directors of the Company stood suspended and the same stood vested with the Resolution Professional of the Company, therefore there were RP Committee meetings were held in lieu of Board of Directors Meetings. We had a random check on Minutes of RP Committee meetings, which were provided to us and our opinion is based upon the same. The Minutes of COC Meetings were not provided to us being confidential.

For SHWETA MUNDRA & ASSOCIATES

ACS Shweta Mundra

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2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	The powers of the Board of Directors of the Company stood suspended and the same stood vested with the Resolution Professional of the Company. The RP and his team have taken up and adopted the said policies.
3.	Maintenance and disclosures on Website: The Listed entity is maintaining a functional website Timely dissemination of the documents/ information under a separate section on the website 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.	The Company maintains the functional website. Web links are provided, wherever required.
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	The powers of the Board of Directors of the Company stood suspended and the same stood vested with the Resolution Professional of the Company.

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Sr. No.	Particulars	Compliance Status (Yes/No/NA	Observations/ Remarks by PCS*
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.		The Company has duly identified and disclosed the subsidiary company but the Resolution Professional does not have the control of the Subsidiarity. The management of M/s Westwind Realtors Pvt Ltd have not provided the financial statements for the year ended March 31, 2023 for consolidation and the Consolidated Financial Statements for the said period have been prepared excluding the Financials of the said Subsidiary company.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		We had a check on Minutes of RP Committee meetings. The Minutes of COC Meetings were not provided to us being confidential. Further, we could not verify with all the updated mandatory Statutory Registers. RP has not received the handover of the statutory registers from the Suspended Management, Further, the Company has adopted the policy regarding the disposal of the records.
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.		Due to the ongoing CIRP, the powers of the Board of Directors of the Company stood suspended. Accordingly, the performance evaluation cannot be done. However, RP committee meeting in lieu of BOD meeting being held with one independent director for regular compliance check.
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee 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.	t T	The powers of the Board of Directors of the Company stood suspended and the same stood vested with the Resolution Professional of the Company. The RPT policy is approved by the RP Committee instead of Audit Committee.

9.	Disclosure of events or information:		As informed to us, the listed entity has provided all the required disclosure(s)
	The listed entity has provided all the required disclosure(s) under Regulation 30		under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time
	along with Schedule III of SEBI LODR Regulations, 2015 within the time limits	- 1	limits prescribed thereunder.
	prescribed thereunder.		
10.	Prohibition of Insider Trading:		As informed to us, the Company has complied with these requirements.
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
11.	Actions taken by SEBI or Stock Exchange(s), if any:	No	The Hon'ble NCLT approved Liquidation of Sri Adhikari Brothers
	No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock		Television Network Limited vide their order dated 16th December, 2021. An appeal was filed by the
	Exchanges (including under the Standard Operating Procedures issued by SEBI		erstwhile management with Hon'ble NCLAT, challenging the liquidation order passed by Hon'ble NCLT by
	through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).		the Appellant. The Hon'ble NCLAT passed an order dated 31st January, 2022 whereby the Liquidation of the
	under separate paragraph nerem ().		Company was stayed and it was directed that the Resolution Plan filed by the erstwhile management be
			presented to the CoC.
			Upon the directions received from the NCLAT, the Resolution Professional (RP) has placed the
			updated Resolution Plan before the CoC which was approved. The RP
			has then filed an Interim Application for approval of the resolution plan
			with Hon'ble NCLT.
			Since the liquidation proceedings were stayed by Hon'ble NCLAT, the
			liquidation process was actually never carried out. Please note that the RP vacated the office on 16th
			December 2021 (when liquidation was approved) and he resumed only
			on 31st January 2022 pursuant to the NCLAT order staying the liquidation
		For S	of the Company. HWETA MUNDRA & ASSOCIATES The RP has subsequently complied

			with all the compliances when he resumed the office and responded to all the emails relating to the late fee imposed by the BSE and stated reasons thereof. The interim period of litigation was not in control of the RP; hence the above compliances could not be made in time. The late fees levied by BSE and NSE are during the above- mentioned period and for which waiver request has been made to BSE and NSE.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	All the compliances for the F.Y. 2022-2023 are completed. by the Resolution Professional and his team.

Observations:

- We have observed some of the Emails from BSE and NSE for the queries related to certain submissions of disclosures or resubmission of the same, which were duly submitted by the RP team.
- In the SDD compliance Certificate for the quarter ended December 31, 2022, inadvertently in heading of Certificate it was written "COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 2022, which can be considered as a manual typo error.

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.	Particulars	Compliance Status	Observations/
No.		(Yes/No/NA)	Remarks by PCS*
1.	Compliances with the following conditions while	e appointing/re-appointing ar	auditor

For SHWETA MUNDRA & ASSOCIATES

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	i. 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	NA	There is no Resignation of the Auditor during the review period.
70	ii. 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 iii. 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.		
2.	Other conditions relating to resignation of statutory auditor	r	
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	NA	There is no Resignation of the Auditor during the review period.

r. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
	a. 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. b. 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.		There is no Resignation of the Auditor during the review period.
	c. The Audit Committee / Board of Directors as the case may be, deliberated on the matter on receip	For SHWETA MUND	RA & ASSOCIATES

-	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:	•
	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.	
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	There is no Resignation of the Auditor during the review period.

(**) 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.	Com-	Regu-	Deviation	Action	Type	of	Details	Fine	Obser-	Man-	Re-
No.	pliance Require-	lation/	S	/ Poply	Action		of Vio- lation	Amoun t	vations / Re-	age- ment	marks
	ment (Regu-	Circular No.		Reply by			lation		marks	Re-	
	lations/									sponse	
	circulars / guide-								Prac- ticing		
	lines								Compa-		
	includin g specific clause)								ny Sec- retary		
1	Regulation 6 (1) A listed entity shall appoint a qualified company secretary as the compliance officer.	n 6 (1)	entity shall	Company Secretary	by NSE BSE.	and	Company has not appointe d a Company Secretary till	imposed by NSE But the Company	a Company Secretary during the reporting period.	Company has	

For SHWETA MUNDRA & ASSOCIATES



2	Regulation	Regulatio	The Company	The		The	nil	No	The	NA
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				No.					after the regular complianc es in the Company.	
3	Regulation	Regulatio	The listed	Director.	The	The listed	i Nil	The	after the regular compliances in the Company.	
3.	Regulation 7(3) of	Regulatio	The listed entity shall	Director.	The	The listea	i Nil	The Complian	after the regular complianc es in the Company.	
3.	Regulation 7(3) of SEBI	Regulatio n 7(3) of SEBI	entity shall	The Complia	The Compliance	The listed entity shall		The Complian ce	after the regular compliances in the Complian Company.	
3.	7(3) of SEBI (Listing	n 7(3) of SEBI (Listing	entity shall submit a	The Compliance Certifica	The	The listed entity shall submit d	a a	The Complian ce Certificat	after the regular compliances in the Company. The Complian ce Certificat	
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3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no	The listed entity shall submit a complian certificate exchange, duly both the complian see office of the listed	e # e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office	after the regular compliance in the Complian ce Certificat digitally signed by Complian ce Officere of as Complian ce officer was rappointed	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no	The listed entity shall submit a complian e certificat e to the exchange, duly signed by both the complian sce office of the listed entity	e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was	after the regular compliance in the Complian ce Certificat is signed is digitally signed by Complian ree Officer of certificat awas rappointed in	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share	The Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by then	The listed entity shall submit a complian ce certificat e to the exchange, duly signed by signed by complian coffice of the listed entity and th	e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dDecember	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent,	The Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by their	The listed entity shall submit a complian e to the exchange, duly signed by both the complian sce office of the listed entity and the authoriss	e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dDecember 2022, the	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever	The Compliance Certificate signed by the RP instead of Compliance Officer of the Company, as there is no	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by there in the	The listed entity shall submit a complian exchange, duly signed by complian excomplian excomplian exce of the entity and the authorise ed	e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dDecember	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable,	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by their	The listed entity shall submit a complian extendinge, duly signed by both the complian sce office of the entity and the authorise d drepresent	e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dDecember 2022, the	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by there in the	The listed entity shall submit a complian exchange, duly signed by both the complian of the listed entity and the authorised drepresent ative	e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dDecember 2022, the	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one month of end	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce officer	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by the in the Company and Authorized	The listed entity shall submit a complian exchange, duly signed by both the complian sce office of the authorise d drepresent ative of the shar	e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dipecember 2022, the	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one month of end of each half of	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce officer by then	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by the in th Company and Authorized Representation	The listed entity shall submit a complian certificat exchange, duly signed by both the complian see office of the listed entity mand the authorise d drepresent ative of the sharp transfer	e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December	after the regular compliance in the Company. The Complian ce Certificat is signed by the RF instead of Complian ce officer was rappointed in dipecember 2022, the	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one month of end of each half of the shall of th	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce officer by then in the	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by their in th Company and Authorized Representative e of the	The listed entity shall submit a complian certificat e to the exchange, duly both the complian see office of the authorise ed drepresent ative of the shar transfer e agent	e e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December 2022.	after the regular compliance in the Complian ce Certificat e signed is digitally signed by Complian ce Officer of as Complian ce officer was rappointed in Company	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one month of end of each half of	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce officer by the in the Compan	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by the in th Company and Authorized Representative e of th Registrar	The listed entity shall submit a complian certificat e to the exchange, duly both the complian see office of the authorise ed drepresent ative of the shar transfer e agent	e e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December 2022.	after the regular compliance in the Complian ce Certificat e signed is digitally signed by Complian ce Officer of as Complian ce officer was rappointed in Company	
3.	7(3) of SEBI (Listing Obligation s and Disclosure Requireme nts) Regulation	n 7(3) of SEBI (Listing Obligatio ns and Disclosur e Requireme nts) Regulatio	entity shall submit a compliance certificate to the exchange, duly signed by both the compliance officer of the listed entity and the authorised representative of the share transfer agent, wherever applicable, within one month of end of each half of the shall of th	The Complia nce Certifica te signed is digitally signed by the RP instead of Complia nce Officer of the Compan y, as there is no Complia nce officer by then in the	Compliance Certificate signed is digitally signed by the RP instead of Compliance Officer of the Company, as there is no Compliance officer by the in th Company and Authorized Representative e of th Registrar	The listed entity shall submit a complian certificat e to the exchange, duly both the complian see office of the authorise ed drepresent ative of the shar transfer e agent	e e e e	The Complian ce Certificat e signed is digitally signed by the RF instead of Complian ce Office of the Company as Complian ce office was appointed in December 2022.	after the regular compliance in the Complian ce Certificat e signed is digitally signed by Complian ce Officer of as Complian ce officer was rappointed in Company	

				Represe	Agent					
				ntative of the Registra		7 =				
				r & Share						
				Transfer Agent						
4.	Regulation	Regulation	the Company	The	Email receive	dthe	Nil	Complied	There was	_
4.	44 of SEBI	44 of SEBI	is required to	XBRL	by BS	ЕСотрапу		by the	а	
	(LODR) Reg			utility for		is			technical issue in	
	50 8		details of its voting results		MUMBAI Dated Sev 1	required to furnish			the XBRL	
					2022	the			utility on	
				errors in		details of			the BSE portal.	
			format within 48 hours of			its voting results in	1		We	
			conclusion of			the			immediat	
			its General	data it is		prescribe		1	ely	
			20000000000000000000000000000000000000	showing		d format w			intimated the same	
				mandator y data to		ithin 48			to BSE	
				be filled		hours of			vide mail	
				8		conclusio		1	dated 20th	
						n of its General			September	
						Meeting			2022 and	
									once the	
					- 1				issue was	
									we	
									submitted	
									the XBRL	
									utility on BSE	
									Listing	
									Centre	
5.	Regulation	Regulation	The second secon	The listed		esListing	Nil	Listing fees	1	
	14 of SEB	14 of SEBI		entity has	paid wi delay.	thfees paid with	4	paid with delay.	CIRP and	
	(LODR) Regulations,		pay all such	rsaid	quetuy.	delay.			there was	
	2015	2015	charges, as	listing		1			issue with	
			applicable, to	fees in	1				respect to funding,	
			the recognised stock	tJune 2022		1			due to	
			exchange(s) by	,					which the	
			30th Apri						payment for listing	
			every year.						fees to	
									NSE and	
									BSE was	
									delayed. However,	
									the	
									exchange	
									were kept informed	
									of the	
									same and	
									the fees	
						FOR CLIN	V-74		was duly paid Werbafters	
				4						

(a) The listed entity has taken the following actions to comply with the observations made in

previous reports:

vious	reports:									
Sr.	Com-	Regu-	Deviations	Action	Туре	Details of	Fine	Ob-	Man-	Re-
No.	pliance	lation/		Taken	of	Viola- tion	Amount	serva-	age-	marks
	Require-	Circular		by	Actio			tions/	ment	
	ment	No.			n			Re-	Re-	
	(Regu-							marks	sponse	
	lations/							of the		
	circulars							Prac-		
	/ guide-							ticing		
	lines							Com-		
	including							pany		
	specific					· .		Secre-		
	clause)							tary		
1	clause)		There is no	The		There is no	NA	The	The	NA
	Regulatio	Regulation	There is no appointment of	Colonia de la co	Rectifi	appointment of	IVA	Compa	Complia	11/1
	n 6 (1) A	6(1)A	Company	y has	cation	Company		ny has		
	listed entity		Secretary and Compliance	appointe d the CS	of the	Secretary and Compliance		taken the	officer was	
	shall			during	deviati	officer in the		reactive	appointe	
	appoint a		Company for	the	on.	Company for the period between		steps for the	d on 5th Decembe	
	qualified company		the period between	reporting time		November 4,		correcti	r 2022.	
	secretary		November 4,			2021 to		on of	NA	
	as the		2021 to November 10,			November 10, 2021. The		the deviati		
	complianc e officer.		2021. The			Company does		on.		
	,,,		Company does			not have				
			not have Company			Company Secretary and				
			Secretary and			Compliance				
			Compliance			officer since				
			officer since 16.11.21 to till			16.11.21 to till date.				
			date.			**********				
2.	Regulatio		The Company		NA	The Company has			The Company	NA
	n 18(3) Read with		has not	Company		not appointed the Internal Auditor		CONTROL DESCRIPTION	is under	
	Part B	Paragraph	appointed the Internal Auditor			as mandatory for		-	Corporate	
	Paragraph		as mandatory for			Listed Entities w/s		Corporat	Insolvenc	
	(4): The Audit		Listed Entities			138 of the			y	
	Committee		u/s 138 of the			Companies Act,			Resolutio n Process	
	shall		Companies Act,			2013. Therefore, The Audit		cy Resoluti		
	mandatori ly review		2013. Therefore, The Audit	(CIRP) under		Committee could		HE TO A CONTRACT OF THE PARTY O	under	
	the		Committee could			not review the		Process	Insolvenc	
	internal		not review the			internal audit			y and	
	audit reports		internal audit	Bankruptc		report.		under Insolven	Bankruptc y Code,	
	relating to			y Code,					y Coue, 2016.	
	internal			2016.				Bankrup		_
	control weaknesse			As per Regulatio				tcy Code,	Regulati	
	s.			n (2) read				2016.	on (2) read	
				with				As per	with	
				paragraph				Regulat ion (2)	purugrup	
				B, the	ı			read	h B, the	
				provisions			-	with	ns of	
				of Regulatio				paragra ph B	Regulati	
				n 18 shall				the	on 18	
				not be		For	SHWETA	provisi	be	01475
				applicable			SHWETA	Regulat	applicabl	LIAIES
					L			Keguiai	-	_

111)										
				to the Company				ion 18 shall not be	Compan	
				being undergoin				applica	undergoi	
				g CIRP				ble to the	ng CIRP under the	
				under the		14		Compa	Insolven	
				Insolvenc				ny being	cy Code	
				y Code.				undergo		
								ing CIRP		
							1	under		
								the Insolve		
							- 1	ncy		
							371	Code	Tri.	NA
3	Regulatio n 17(8) and			The company		The company does not have a CFO	NA	The appoint	The Compan	IVA
	Regulatio	Regulation	quarterty and annual financials	does not		(Chief Financial		ment of	y is	
	n 33(2) of LODR	33(2) of LODR		have a		Officer) for a		CFO is pending	under CIRP	
	(certificati	LODK		CFO		period from	9		and the	
	on of			(Chief Financial		26.05.2020 till date due to the			manage ment is	
	quarterly and		1	Officer)		resignation of the			suspende	
	annual			for a		CFO.			d and the	
	financials by CFO)			period from					vests	
				26.05.2020					with the RP	
				till date						
				due to the						
				resignatio n of the						
				CFO.						
1	Regulatio	Regulation		The		The Company			The Company	NA
	n 25(3) of SEBI		Independent Directors)			failed towards the compliance which		e	is under	
	(LODR)	(LODR)		A SEASON OF THE		states that the		meeting of IDs.	Corporate	
	Regulatio ns, 2015	Regulations, 2015		770050		Independent		,	Insolvenc	
	(Meeting	7.233		complianc		Directors of the company shall			Resolutio	
	of Independe					hold at least one			n Process	
	nt			that the	Bankru	meeting in a			(CIRP) under	
	Directors)			Independe		financial year, without the			Insolvenc	
				Parameter Control	Code, 2016.	attendance of			y and	
				of the	200000000	Non-Independent			Bankruptc	
				company	n ,	Directors and			y Code, 2016.	
				shall hold at least	tion	members of management.			As per	
				one	(2)				Regulati on (2)	
				meeting in	read				read	
				a .::-1	with				with paragrap	
				financial year,	paragr				h B, the	
				without	aph B	1			provisio ns of	
				the	the				Regulati	
				attendance of Non		i			on 18	1
				Independe	1				be	
	1			nt	Regula	z			applicable to the	
				Directors and	tion 1	8			Compan	-
				members	shall	F 011	MAZETA MUDI	IDDA 9	y being	
				of	not b	e hor SH	WETA MUI	1	ng CIRF	LO
				managem	e			de.		_

_				La							
				nt.	applic					under the Insolven	
					able to					cy Code	
					the					.	
			i		Compa						
					ny						
					,						
					being				1		
					underg						
					oing						
					CIRP						
					under						
					the						
					Insolv						
					ency						
					Code.					and .	***
5	Regulatio	Regulation			Pursuan		ompany		The Compa	The Compan	NA
	n 7(3) oj SEBI	7(3) of SEB. (Listing	A STATE OF THE PROPERTY OF THE	Company					ny is		
	(Listing	Obligations	the compliance which states that			complianc states th			under	under	
	Obligation	and	the Independent			Independer			CIRP	CIRP	
	s and	Disclosure	Directors of the	complianc	ion 7(3)	Directors	of the		and the	and the	
	Disclosure Requireme	ts)	company shall	le which	of SEBI	company	shall		ment is		
	nts)		hold at least one	1		hold at le	east one		suspend	suspende	
	Regulatio	, 2015				meeting	in a		00000	d and the	
	ns, 2015		financial year	Independe	ions	financial	year,		the power	power vests	
				nt	and	without	the		vests	with the	
			The second of th	Directors					with	RP.	
			Non-Independent		ure .	Non-Indep			the RP.		
				company			and				
			A DESCRIPTION OF THE PARTY OF T	shali hold		members	of or				
			management.	at least	ions,	munugeme	nı.				
				meeting in			17	1			
				a a	the	Mary .					
				financial	Compli						
				year,	ance						
					Certific						
				the	ate						
				attendanc							
				e of Non-							
				Independe					s		
				nt	y signed						
				Directors	by the						
			1	and members	instead						
				of	of						
				managem							
				nt.	ance						
				"	Officer	1				i	
					of th	e					
					Compa						
					y, a	s					
					there i	s					
					no						
					Compli						
					ance						
				9 9 1	officer				V	-	
					by the				A CONTRACTOR OF THE PARTY OF TH		
					in th	1	For	HWETA M	UNDRA	& ASSOC	ATES
				-	Compa				1		
			1	1	y an	14			d	_	

					Authori					
					zed					
					Represe					
					ntative					
					of the					
					Registra					
					r &					
					Share					
					Transfer					
					Agent					
					for the					
					year					
					ended					
					31st					
					March,					
					2022.					
	Regulatio	Regulation	The board of	RP	The	The board of	NA	NA	The	NA
	n 17(2)	17(2) SEBI		Committe	Compan	C125.0		1	Company	
	SEBI	2 * * * * * * * * * * * * * * * * * * *	meet at least four			meet at least four			is under	
	(Listing		times a year,			times a year, with			Corporate	
	obligation	ana				a maximum time			Insolvenc	
	s and	disclosure	with a maximum	n neu oj	The second second				insolvenc	
	disclosure		time gap of one	Boara	100	gap of one			y Resolutio	
	requiremen	375		_ ~		hundred and		1	2018/40-60/04/20/20/20/20/	
	ts)	Regulations				twenty days		- 1	n Process	
	Regulatio	, 2015	between any two		Resoluti	between any two		- 1	(CIRP)	
	ns, 2015		meetings.		on	meetings.			and Mr.	
			F.754		Process	· · ·	- 1		Vijendra	
					(CIRP)				Kumar	
					and Mr.		1		Jain has	
					Vijendr				been	
					la				appointed	
					Kumar				as a	
									Resolutio	
					Jain has	⊕				
					been				n D (
					appoint				Profession	
					ed as a	1 1			al.	
					Resoluti	4				
					on				The	
					Professi				members	
					onal.				of the RP	
	!								committe	
									e meeting	
						-			are Mr.Vijen	
									dra	
									Kumar	
						E .		3	Jain and	
									Mr.	
						1			Ganesh	
									Raut	
		Dogulation	The Company	NA	As	The Company	NA	As	The	NA
		Regulation	could not have:	. 11.1		could not have:	0.000	intimat	Compan	
	Regulation					Meeting of Audit		ed to		
	18(2) SEBI		Meeting of Audit			Committee		us, The	under	
			Committee		The	FOR STANSON MARKET		Compa	CIRP	
		19(3A) SEBI			Compan			ny has		
	19(3A) SEBI		Meeting of	1	F	Meeting of		been	manage	
	LODR	Regulation	Nomination and	d .	been	Nomination and		holding	ment is	
	Regulation	20(3A) SEBI	Remuneration		holding			RP	suspende d and the	-
	20(3A) SEBI	LODR	Committee		RP	Committee		commit	power	
	LODR	Regulation		A	commit	Meeting of		tee		
	Control of the Contro		Stakeholders 0)		ee	Stakeholders		meeting s every	100000000000000000000000000000000000000	
	Regulatio	SERI LODE	Relationship			Relationship		guarter,	102222000	
		JEDI LODIK	relationship	1	meering	Committee		compris	0.000	
	n 25(3) &				Ic 273.000					
	n 25(3) & (4) SEBI		Committee				PE SHIME			
	n 25(3) &		Committee Meeting oj independent		quarter,	Meeting of independent	OF SHWET	aing of	DAPACC	: 001

	directors	ing of directors one an indepen dent director and a resoluti on professi onal, in lieu of the board meeting for necessar y complia nces.	indepen dent director and a resoluti on professi onal, in lieu of the board meeting for necessa ry complia nces
8 SEBI Circular No. SEBI / HO / CFD / CMD1 / CIR / P / 2019/140 dated November 21, 2019	The disclosure in NA disclosure terms of SEBI in terms of Circular No. SEBI / HO / CFD / CMD1/ CIR / P HO / CFD / 2019 / 140 dated CMD1/ CIR November 21, / P /2019 / 2019, for the 140 dated quarter ended November March 31, 2022 the quarter submitted within March 31, 7 days from the 2022 has to last date of the quarter date of the quarter last date of the quarter	The The disclosure in Companterms of SEBI y has Circular No. SEBI submitt / HO / CFD / ed the CMD1/ CIR / P said /2019 / 140 dated disclosu November 21, re on 2019, for the April quarter ended 29, 2022 March 31, 2022 for the has to be quarter submitted within ended 7 days from the March last date of the 31, 2022. quarter	Complia ance Done Done NA

Assumptions & Limitation of scope and Review:

 Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

 We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

4. 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 Shweta Mundra & Associates

Date: 26.05.2023 Place: Mumbai

For SHWETA MUNDRA & ASSOCIATES

Shweta Mundra.

CS Shweta Mundra ACS/ No.: A38115 CP No.: 15387

UDIN: A038115E000424633

ACS Shweta Mundra Mem - A38115 COP - 15387