



Kridhan Infra Limited

Date: May 30, 2022

To,
Bombay Stock Exchange Ltd
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai 400 001
Ref: Scrip Code 533482

To,
National Stock Exchange of India Ltd.
Exchange Plaza, C-1, Block-G,
Bandra Kurla Complex, Bandra (East),
Mumbai 400051.
Ref: Symbol: KRIDHANINF

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022.

Dear Sir,

Pursuant to regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, kindly find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2022.

Request you to kindly take the same on record

Thanking You,

Yours Truly,

For **Kridhan Infra Limited**

Anil Agrawal
Managing Director
DIN: 00360114



Rinkesh Gala & Associates

Practicing Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF KRIDHAN INFRA LIMITED FOR THE YEAR ENDED MARCH 31, 2022

(Pursuant to SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019
read with SEBI's Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019)

We, **Rinkesh Gala & Associates**, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Kridhan Infra Limited** (CIN: L27100MH2006PLC160602) ("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, 2022 ("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;
- (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 (Buy-back of Securities) Regulations, 2018; (**Not applicable to the Company during the Audit Period**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not applicable to the Company during the Audit Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not applicable to the Company during the Audit Period**);



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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the Audit Period)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agent) Regulations, 1993;
- (k) Securities and Exchange Board of India (Stock Brokers and Sub-Brokers) Regulations, 1992; **(Not applicable to the Company during the Audit Period)**;

and circulars/ guidelines issued thereunder; and based on the above examination and considering the various relaxations granted by the Securities and Exchange Board of India in the wake of spread of COVID-19 pandemic, we 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:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	The Company is required to submit consolidated financial results under regulation 33 of SEBI (LODR) 2015.	Non-submission of consolidated financial results of its Subsidiary Company and Associate Company.	The Company has not consolidated its accounts with its subsidiaries i.e. with Readymade Steel Singapore Pte. Ltd and K.H.Foges Pte. Ltd. for all the Quarter of FY 2021-22 as both Companies are under liquidation. Further, the Company has not consolidated its accounts with its Associates i.e. with Vijay Nirman Company Private Limited for the quarter ended September 30, 2021. However, the figures of the second quarter have been included in the figures of third quarter and nine months ended December 31, 2021.

- (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/our examination of those records.



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(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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary, if any.
1.	BSE Limited (BSE)	-	-	-
2.	National Stock Exchange of India Ltd (NSE)	-	-	-

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1	The Company was required to appoint Company Secretary as compliance officer upon resignation of CS Nikita Dahat on 25/08/2020. However, CFO- Mrs Rajeshree Mishra was appointed as Compliance Officer of the Company for the time being, till new CS was not appointed, Further the appointment of Company Secretary- Neha Shah as Compliance officer was done on 18/03/2021.	The company complied with the appointment of Company Secretary and Compliance Officer w.e.f. 18th March, 2021.	Complied with the appointment of Company Secretary and Compliance Officer.

for **Rinkesh Gala & Associates**
Practising Company Secretaries

Rinkesh Gala
Proprietor
ACS No.42486 | C.P. No.20128

UDIN: A042486D000437023

Date: May 30, 2022

Place: Mumbai