(Formerly: The Jayabharat Credit & Investment Co. Ltd.) CIN: L66000MH1943PLC003899

JCL: 05.2021

28.05.2021

To, The Manager – Listing Department The BSE Limited PhirozeJeejeebhoy Towers, Dalal Street, Mumbai – 400 001.

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2020-21.

Pursuant to SEBI vide its circular no. CIR/CFD/CMD1/27/2019 dated 08.02.2019, Please find annexed hereto the Annual Secretarial Compliance Report dated 27th May, 2021 for the financial year ended 31st March, 2021 issued by Mr. Prashant S. Mehta, proprietor of P. Mehta and Associates, Practicing Company Secretary.

We request you to kindly take the note of the above.

Thanking you,

Yours faithfully,

For Jayabharat Credit Limited,

BIPIN B BHAVSAR,

CHIEF EXECUTIVE OFFICER.

Annexture: As above.



P. MEHTA & ASSOCIATES

Practising Company Secretaries

SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015)

OF JAYABHARAT CREDIT LIMITED

FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2021.

- I, Prashant S. Mehta, Proprietor of P. Mehta & Associates, a Practicing Company Secretary, have examined:
- a) all the documents and records made available to me and explanation provided by Jayabharat Credit 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 31stMarch, 2021 ("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
- 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; Not applicable during the audit period
- 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; Not applicable during the audit period
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not applicable during the audit period
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not applicable during the audit period
- g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not applicable during the audit period
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and based on the above examination, I hereby report that, during the Review Period

AUNBA AOS 5814 CP. NO. 1734

COMPANY

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

Sr No	Compliance Requirement (Regulations/Circulars/Guideline s including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
		NIL	

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my examination of those records.
- c) There were no action 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 there under:

Sr No	Action taken by	Details of violation	Details of Action taken E.g. Penalty, warning letter, debarment etc	Observations/Remarks of the Practicing Company Secretary, if any
			NIL	***************************************

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

Sr No	Observations/Rem arks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended (The years are to be mentioned)	Actions taken by the listed entity, if any	Observations of the Practicing Company Secretary on the actions taken by the listed entity
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For P Mehta & Associates Practicing Company Secretaries

Prashant S Mehta

ACS: 5814 COP: 17341

UDIN: A005814C000379693

PRASHANT S. MEHTA COMPANY SECRETARY M. NO. 5814 CP. NO. 17341

> Date: 27th May,2021 Place: Mumbai

