



Kridhan Infra Limited

30th June, 2021

To,
BSE Limited
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

Ref: Symbol: KRIDHANINF

**Subject: Annual Secretarial Compliance Report of the Company
for the year ended March 31, 2021.**

Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019

Dear Sir,

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report duly signed by the Practicing Company Secretaries for the year ended March 31, 2021.

Please take the above information on record.

Thanking You,

Yours Truly,

For **Kridhan Infra Limited**



Anil Agrawal
Managing Director
DIN: 00360114

Encl: As above



Rinkesh Gala & Associates

Practicing Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF KRIDHAN INFRA LIMITED FOR THE YEAR ENDED MARCH 31, 2021

(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 Secretary 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, 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
 - (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**);



Rinkesh Gala & Associates

Practicing Company Secretaries

- (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 fill intermittent vacancy of a company secretary as the compliance officer under regulation 6 of SEBI (LODR) 2015.	Non-appointment of company secretary as the compliance officer.	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.

- (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.
- (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:



Rinkesh Gala & Associates

Practising Company Secretaries

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	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	Comments of the Practising Company Secretary on the actions taken by the listed entity
	Nil	Nil	Nil	Nil

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

RINKESH
RASHIKLAL
GALA



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

UDIN: A042486C000550895

Date: June 30, 2021

Place: Mumbai