

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

CIN: L92100DL1994PLC059093

To,

BSE Limited
25th Floor, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001

Metropolitan Stock Exchange Limited
Building A, Unit 205A, 2nd Floor,
Piramal Agastya Corporate Park,
L.B.S Road, Kurla West, Mumbai -400070

Sub: Submission of Annual Secretarial Compliance Report vide SEBI Circular No CIR/CFD/CMD1/27/2019 dated February 08, 2019 and Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 for the year ended 31st March, 2021

Dear Sir,

In pursuant to SEBI Circular No CIR/CFD/CMD 1/27/2019 dated February 08, 2019 and Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015, we are attaching herewith the Annual Secretarial Compliance Report of Sadhna Broadcast Limited issued by M/s V Kumar & Associates, Practicing Company Secretaries dated June 29th, 2021, for the financial year ended 31st March, 2021.

Please find the same enclosed herewith.

Kindly consider and take our submission in your records.

Thanking You

Yours faithfully

For Sadhna Broadcast Limited


Name: **Tajinder Kaur**

DIN: 06799570

Designation: **Managing Director**

Address: 24/27 Front Side,

West Patel Nagar, Delhi-110008

Date: 29/06/2021

Place: New Delhi

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

Email ID: cbnl.delhi@gmail.com, Website: 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

Secretarial Compliance Report of Sadhna Broadcast Limited for the year ended 31st March, 2021

I Vivek Kumar, Practicing Company Secretary have examined:

- all the documents and records made available to us and explanation provided by Sadhna Broadcast Limited("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity.
- any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended 31st March, 2021 in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI ACT") and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI"); including

The Specific Regulations, whose provisions and the Circulars/ Guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulations 2018; **(Not Applicable during the Review period)**
- Securities and Exchange Board of India (Substantial Acquisition of shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the Review period)**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Review period)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Review period)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013. **(Not Applicable during the Review period)**

Vivek Kumar

- i) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- l) 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, as applicable, 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
NIL			

(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/ 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 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 of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

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1.	Non Compliance of Reg. 33 of SEBI (LODR) Regulations, 2015	Delay in Submission of Financial Result for the Quarter and Year ended 31 st March, 2019	The Company has already paid penalty for the same to Stock Exchange via UTR No. SBIN819172111744 to MSEI and UTR No. SBINB819172111507 to BSE dated 21 June 2019.	The Company has already paid penalty for the same to Stock Exchange via UTR No. SBIN819172111744 to MSEI and UTR No. SBINB819172111507 to BSE dated 21 June 2019.
2.	Non Compliance of Reg. 42 of SEBI (LODR) Regulations, 2015	Non Submission of Date of Intimation of record date to the Exchange as the Board declare Final dividend June 05, 2019	The Company has paid penalty for the same to Stock Exchange via UTR No. 022231807271 to MSEI date 07 May, 2020.	The Company has paid penalty for the same to Stock Exchange via UTR No. 022231807271 to MSEI date 07 May, 2020.

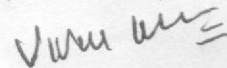
NOTE: In view of the second wave of the COVID 19 pandemic and as per guidance issued by the Institute of Company Secretaries of India (ICSI) for carrying out professional assignments, the Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 was conducted by using appropriate Information Technology tools by Virtual Data sharing on e-mode to access and examine relevant documents for completion of the Audit.

Further this report has been undertaken to the best of my capability based on e-verification of scans, soft copies, information, confirmations, records and documents made available to us by the management.

Date: 29th June, 2021

Place: New Delhi

Signature
For V Kumar and Associates
(Company Secretaries)



Vivek Kumar

M. No. : F8976

COP No: 10438

UDIN: F008976C000541849