

# CS

**Neha Poddar**

Company Secretary

129 Bangur Avenue  
Block "A", Opposite Reliance Fresh  
Kolkata - 700 055

Phone: + 91 99030 48692

[csneha.poddar2710@gmail.com](mailto:csneha.poddar2710@gmail.com)

To  
Monitoring Committee  
Jet Airways (India) Ltd  
CIN:- L99999MH1992PLC066213  
Global One, 3rd floor, 252, LBS Marg,  
Kurla (West), Mumbai - 400070

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

Dear Sir,

I have been appointed to conduct an Audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February 2019 and to issue the Annual Secretarial Compliance Report for M/s. Jet Airways (India) Limited (hereinafter referred to as the "Company") bearing CIN: L99999MH1992PLC066213 whose Shares are listed on BSE and NSE.

Company was facing financial distress and was unable to service its scheduled debt resultant the company was forced to suspend its operations on April 17, 2019 as a result, the directors, CEO, CFO, CS including other top management personal had resigned. In absence of the top management officials and requisite personnel, this report is based on the information gathered by the erstwhile Resolution Professional and the remaining employees of Asset Preservation Team. As per requirements of the 'Code' and 'CIRP Regulations', the erstwhile RP had invited expression of Interest (EoI) from prospective Resolution Applicants (PRAs) to submit the Resolution Plan for the Company. Final plans received was placed and put to vote in the 17th CoC meeting held on 03rd October 2020. The resolution plan submitted by the Jalan Fritsch Consortium was approved by CoC. The application for Plan approval was filed with Hon'ble National Company Law Tribunal (NCLT) dated 05th November 2020 and subsequently has been approved/allowed by the Hon'ble NCLT on 25th June 2021 via order dated 22nd June 2021, subject to certain directions which are to be issued by a separate order. As per the terms of the Resolution Plan approved/allowed by the Hon'ble NCLT on 25th June 2021 via order dated 22nd June 2021, Monitoring Committee was constituted on 28th June 2021.

My responsibility is to verify Compliance by the Company with the provisions of all applicable SEBI Regulations and Circulars/Guidelines issued from time to time and issue a Report thereon.

My Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications considered and necessary and adequate for the said purpose. Annual Secretarial Compliance is attached herewith.

*Neha Poddar*

Neha Poddar  
Practicing Company Secretary  
Mem No:-A33026  
Cp No:- 12190  
Place:- Kolkata  
Dated:- 30.06.2021



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**Secretarial Compliance Report of Jet Airways (India) Limited**  
**(CIN: L99999MH1992PLC066213)**  
**for the year ended March 31, 2021**

I have examined:

- a) All the documents and records made available to me and explanations provided by the Company;
- b) the filings/submissions made by the company to the Stock Exchanges;
- c) Website of the Company;
- d) Any other documents/filings, as may be relevant, which has been relied upon to prepare this Certificate.

For the financial year ended on March 31, 2021 in respect of Compliance with the provisions of:

1. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, Circular, Guidelines issued thereunder and;
2. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under and the Regulations, Circular, Guidelines issued thereunder by the Securities & Exchange Board of India (SEBI);

The specific Regulations whose provisions and the Circulars/Guidelines issued thereunder have been examined, includes -

- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) \*The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
- (d) \*The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 notified on 28 October 2014;
- (e) \*The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008.
- (g) \*The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;



(h) \*The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;

\*Not applicable as no event took place under these Regulations during the financial year under review and circulars/ 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 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, if any
1.	Regulations 33(3)(a) of SEBI (LODR), 2015 - Consolidated Financial Results along with the Auditors Report - For all Quarters	Not filed till the date of issue of report.	Not been Filed.
2.	Regulation 23(9) of SEBI (LODR), 2015 - Disclosure of RPT with half yearly Financials	Not filed till the date of issue of report.	Pending, Under Process.
3.	Regulations 33(3)(a) of SEBI (LODR), 2015 - Standalone Financial Results along with the Auditors Report	Delayed in submission.	The financials were submitted on 30.06.2021
4.	For first 3 quarters - Regulation 27(2)(a) of the SEBI (LODR) Regulation, 2015 of Corporate Governance. -For all Quarters	Not filed till the date of issue of report.	Not filed
5.	Regulation 14 of SEBI (LODR) Regulations, 2015 of Fee and other charges to be paid to the recognized Stock Exchange(s) for the Financial Year ended 2021	NSE Listing fees paid; BSE listing fees disputed.	Pending till the date of issue of report
6.	Regulation 6(1) of SEBI LODR Regulations, 2015-A listed entity shall appoint a qualified company secretary as the compliance officer.	No CS in the Company as all resigned before it came under CIRP.	As the company is under CIRP and now is in the process of revival.



- b) It has been observed that the Annual General Meeting of the company was not held within the time period specified in Section 96 of Companies Act,2013. The AGM for the aforesaid period was held on 8<sup>th</sup> June,2021 which was adjourned due to want of quorum and the Adjourned AGM was held on 15<sup>th</sup> June,2021.
- c) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.
- d) The following are the details of actions taken against the Company, its Promoters, Directors, either by the 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 – No show cause notice received *by the Company for the aforesaid period.*
- e) The listed entity has taken the following actions to comply with the observations made in previous reports: - The previous year report is not submitted till date.

*Nehe Poddar*



**Place: Kolkata**  
**Dated: 30.06.2021**

**NEHA PODDAR**  
**(Practicing Company Secretary)**  
**ACS – 33026 / CP – 12190**  
**UDIN NO: A033026C000561708**