

**ADHBHUT INFRASTRUCTURE  
LIMITED**



Registered Office:  
D-15, Pamposh Enclave, Greater Kailash-I, New Delhi-110048  
Tel.: +91-11-45210051, E-mail : adhbhut.ind@rediffmail.com  
CIN : L51503DL1985PLC020195

**Ref.No.: AIL/BSE/16/2022-23**

**Dated: 26.05.2022**

The Secretary  
**BSE Limited**  
1st Floor, New Trading Wing, Rotunda Building  
Phiroze Jeejeebhoy Towers, Dalal Street, Fort  
Mumbai-400001

**Security Code No.: 539189**

**Dear Sir/Madam,**

**Reference: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

**Subject:** Annual Secretarial Compliance Report for the financial year ended March 31, 2022

Please find the enclosed herewith Annual Secretarial Compliance Report of the Company pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued by **M/s S. Khurana & Associates, Practicing Company Secretaries**, for the financial year ended March 31, 2022 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

You are requested to kindly take the above facts on your records.

Yours faithfully  
For **Adhbhut Infrastructure Limited**

ANUBHA V DHAM  
Digitally signed by  
ANUBHAV DHAM  
Date: 2022.05.26  
13:00:59 +05'30'

ANUBHAV DHAM  
Whole Time Director  
DIN: 02656812

Enclosed: A/a

# S. Khurana & Associates

Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF  
ADHBHUT INFRASTRUCTURE LIMITED  
For the year ended March 31, 2022**

**Entity Name : Adhbhut Infrastructure Limited**  
**CIN : L51503DL1985PLC020195**  
**Regd. Address : D-15, Pamposh Enclave, Greater Kailash - I,  
New Delhi - 48**

I, Sachin Khurana, Practicing Company Secretary of S. Khurana and Associates have examined that:

- All the documents and records made available to us and explanation provided by **ADHBHUT INFRASTRUCTURE 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 March 31, 2022 ("Review Period") 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 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI (LODR) Regulations, 2015");
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;- **Company has not issued any type of Security during the reporting 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 as the Company has not bought back any of its Securities.**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Company has not issued any debt security during the reporting period.**



- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable.**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) (Other regulations as applicable) and circulars/ guidelines issued thereunder;

I, **Sachin Khurana**, 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: -

<b>S. No.</b>	<b>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</b>	<b>Deviations</b>	<b>Action Taken</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1.	Regulation 23(9)-Related Party Disclosure for Quarter ended September 30, 2021	<b>Delayed Submission</b>	<b>Fine was levied of Rs. 47,200/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>
2.	Regulation 34 - Submission of Annual Report to Stock Exchange	<b>Delayed Submission for March 2021</b>	<b>Fine was levied of Rs. 47,200/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>
3.	Regulation 29(2)/29(3) - Delay in furnishing prior intimation to stock exchange about the meeting of Board of Directors	<b>Delayed intimation to stock exchange for meeting held on November 13, 2021 for financial results</b>	<b>Fine was levied of Rs. 11,800/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>



4.	Regulation 33 - Non submission of financial results/reports within stipulated time	<b>Delayed submission of standalone limited review report for the quarter ended June 2021</b>	<b>Fine was levied for Rs. 59000/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>
5.	<b>Regulation 6 (1): Appointment of Company Secretary</b>	<b>The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer</b>	<b>Fine was levied for March 2021 Rs. 23,200/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>
5.	Regulation 33 - Non-Submission of Financial Results within the period prescribed under this regulation	<b>Delayed Submission for Quarter ended March 2021</b>	<b>Fine was levied of Rs. 1,71,100/-</b>	<b>As informed by the management of the Company, fine amount is pending for payment to stock exchange</b>

(b) The listed entity has generally maintained 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:

<b>S. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
1	<b>Stock Exchange</b>	<b>Non-compliance with Regulations of SEBI (LODR) Regulations, 2015</b>	<b>Warning letter of Freezing of Promoter shareholding and fine was levied for</b>	<b>As informed by the management, payment of Fine amount is in process.</b>



			<i>various non compliances of SEBI (LODR) Regulation, 2015</i>	
2	<b>Stock Exchange</b>	<b>Non-Compliance with regulation 33 for quarter ended June 2021 - Company has submitted Standalone Auditor Report instead of Limited Review Report</b>	<b>Letter issued by BSE for re-submission of Limited Review Report</b>	<b>Company has re-submitted the Limited Review report for the Quarter ended June 2021 on August 26, 2021</b>

*\*The Listed Entity has also defaulted in payment of Annual Listing Fee on time because of which the listed entity is suspended from BSE.*


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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the Secretarial Compliance report for the Year ended March 31, 2020</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1.	<b>Non-compliance with Regulation 13</b>	<b>Payment of Annual Listing Fees is pending.</b>	<b>As informed by the management, payment of Annual Listing Fee is in process</b>	<b>Company is suspended on Stock Exchange</b>
2.	<b>Non-Compliance with Regulation 6(1) w.r.t appointment of Whole-time Company Secretary</b>	<b>The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer</b>	<b>Board of Director in the Board Meeting held on January 21, 2021 has appointed Mr. Sandeep Kumar Likhmania (M. No. A28942) as Company Secretary &amp; Compliance Officer of the Company</b>	<b>Company has complied with the requirement of said regulation w.e.f Sandeep Kumar Likhmania</b>



3.	Regulation 23(9)-Related Party Disclosure for Quarter ended September 30, 2020	Delayed Submission	Fine of Rs. 300,900/- (Including GST @ 18%) was imposed on the listed entity	As informed by the management of the Company, fine amount is pending for payment to stock exchange
4.	Regulation 34 - Submission of Annual Report to Stock Exchange	Delayed Submission	Fine was levied of Rs. 68,440/-	As informed by the management of the Company, fine amount is pending for payment to stock exchange
5.	Regulation 31 - Submission of Shareholding pattern	Delayed Submission	Fine was levied of Rs. 59,000/-	As informed by the management of the Company, fine amount is pending for payment to stock exchange

For S. Khurana & Associates  
Company Secretaries  
FRN: I2014DE1158200  
Peer Review No. 804/2020

  
Sachin Khurana  
Proprietor  
M. No.: F10098; CP No. 13212  
UDIN - F010098D000339757



Date: 18-05-2022  
Place: New Delhi