

S. Khurana & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF ADHBHUT INFRASTRUCTURE LIMITED For the year ended 31st March, 2020

Entity Name : Adhbhut Infrastructure Limited
CIN : L51503DL1985PLC020195
Registered 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 31st March, 2020 (‘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;
- 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.**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable.**



20/07/2020

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- 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: -

S. No.	Compliance Requirement (Regulations! circulars! guidelines including specific clause)	Deviations	Action Taken	Observations! Remarks of the Practicing Company Secretary
1.	Regulation 13: Fees and Other Charges to be paid to the Stock Exchange	Payment of Annual Listing Fees (ALF is pending as on even date).	Suspended on Stock Exchange	The Annual Listing Fees (ALF) has not been paid for 2019-20
2.	Regulation 6 (1): Appointment of Company Secretary	The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer	Fine of Rs. 1,08,560/- (Including GST @ 18%) was imposed on the listed entity @Rs. 1,000 per day till Quarter Ended December 2019	Till date Company has not appointed the Whole - Time Company Secretary.
3.	Regulation 13(3): Statement on Shareholder Complaints	Delayed Submission	Fine of Rs. 16,520/- (Including GST @ 18%) was imposed on the listed entity @Rs. 1,000 per day till date of compliance	Payment of Fine is pending



30/07/2020

4.	Regulation 23(9)- Related Party Disclosure for Quarter ended March 2019, June 2019 and September 2019	Delayed Submission	As per the information provided, no action was taken against listed entity	Submission was made beyond the due date
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(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:

S. 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.
1	Stock Exchange	Regulation 13(3) of the SEBI (LODR), Regulation 2015	Freezing of Promoter shareholding for non-compliant with Regulation 13(3) for Quarter December 2019	Payment of Penalty amount is in process.
2	Stock Exchange	Regulation 14-Fees and other charges- Failure to pay the arrears of Annual Listing Fees	Fees Not paid	Company has been suspended on BSE

*The Listed Entity has regularly defaulted in complying with the requirement of Regulation 6 of SEBI (LODR) Regulation, 2015 with respect to the appointment of Company Secretary.

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

*Website of the company is de-activated as on date of this report for non-payment of website fee



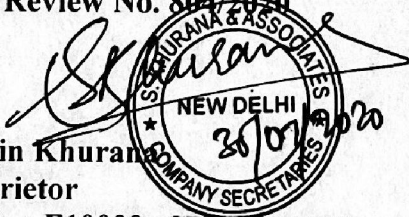
30/07/2020

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

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.
1.	Stock Exchange	<i>Regulation 14-Fees and Other Charges to be paid to the Stock Exchange (Annual Listing Fee not paid)</i>	Fine was imposed by BSE and Company was suspended	Annual Listing Fee was not paid due to which Stock Exchange has suspended the listed entity
2.	Stock Exchange	<i>Regulation 6 (1) of the SEBI (LODR), Regulation 2015 for failure to appoint Company Secretary</i>	Fine was imposed by BSE	As per the information provided, the listed entity has not paid the fine as imposed by BSE

For S. Khurana & Associates
Company Secretaries
FRN: I2014DE1158200
Peer Review No. 80472020

Sachin Khurana
Proprietor
M. No.: F10098; CP No.:13212
UDIN - F010098B000533423



Date: 30/07/2020
Place: New Delhi