

# ADHBHUT INFRASTRUCTURE LIMITED

Registered Office : 910, Ansal Bhawan, 16 K. G. Marg, Delhi-110 001  
Tel. : +91-11-23752586-90 Fax. : +91-11-23752645 E-mail : info@adhbhutinfra.com  
Web. : www.adhbhutinfra.com

**Ref. No.: AIL/BSE/2019**

**Date: 29<sup>th</sup> May, 2019**

**To**

The Manager  
Listing Department  
**The BSE Limited,**  
Phiroze Jee Jee Bhoy Towers,  
Dalal Street, Mumbai – 400001

**BSE SECURITY CODE: 539189**

**Sub: Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31<sup>st</sup> March, 2019.**

Dear Sir,

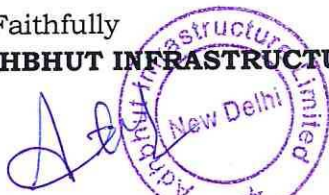
Please find enclosed herewith the **Secretarial Compliance Report** pursuant to **Regulation 24A** of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended **31<sup>st</sup> March, 2019**.

You are requested to kindly take the same on record and oblige.

Thanking you

Yours Faithfully

For **ADHBHUT INFRASTRUCTURE LIMITED**



**AMARJEET SINGH RAWAT**  
Chief Executive Officer

# S. Khurana & Associates

## Company Secretaries

Email: [sachinkhuranacs@gmail.com](mailto:sachinkhuranacs@gmail.com)

(M): 9540407575, 9999512628

### SECRETARIAL COMPLIANCE REPORT OF ADHBHUT INFRASTRUCTURE LIMITED For the year ended 31<sup>st</sup> March, 2019

To,  
The Board of Directors  
Adhbhut Infrastructure Limited  
L51503DL1985PLC020195  
D-15, Pamposh Enclave,  
Greater Kailash – I, New Delhi - 110048

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 31<sup>st</sup> March, 2019 ("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.**



- 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:-

<i>S. No.</i>	<i>Compliance Requirement (Regulations! circulars! guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations! Remarks of the Practicing Company Secretary</i>
<i>1.</i>	<i>Regulation 14-Fees and Other Charges to be paid to the Stock Exchange</i>	<i>Payment of Annual Listing Fees (ALF is pending as on even date).</i>	<i>The Annual Listing Fees (ALF) has not been paid for the Financial Year 2018-19 &amp; 2019-20.</i>
<i>2.</i>	<i>Regulation 6 (1) of the SEBI (LODR), Regulation 2015</i>	<i>The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer</i>	<i>Till date Company has not appointed the Whole - Time Company Secretary.</i>

(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:





<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	Stock Exchange	Regulation 6 (1) of the SEBI (LODR), Regulation 2015	Company has received notice dated May 14, 2019 imposing fine of Rs. 1,000 per day (computed till March 31, 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	The Annual Listing Fees (ALF) has not been paid for the Financial year 2018-19 & 2019-20.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable, since this report is being issued for the first time and accordingly no action was required to be taken by the company.

For S. Khurana & Associates  
Company Secretaries

  
Sachin Khurana  
Practicing Company Secretary  
CP No.:13212  
Membership No.: F10098



Date: 28-05-2019  
Place: New Delhi