

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/2021-2022

Date: 30.06.2021

To,
BSE Limited,
Phirozee Jeejee Bhoy Towers,
Dalal Street,
Mumbai-400001

BSE SECURITY CODE: 539189

Subject : Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2021.

This is for your information and records.

**Thanking you
Yours Faithfully**

For **ADHBHUT INFRASTRUCTURE LIMITED**

ANUBHA
V DHAM

Digitally signed
by ANUBHAV
DHAM
Date: 2021.06.30
19:23:49 +05'30'

**ANUBHAV DHAM
DIRECTOR
DIN: 02656812**

Enclosed: As Stated

S. Khurana & Associates

Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF
ADHBHUT INFRASTRUCTURE LIMITED
For the year ended March 31, 2021**

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 March 31, 2021 (“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.**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (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>Action Taken</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
1.	Regulation 13: Fees and Other Charges to be paid to the Stock Exchange	Payment of Annual Listing Fees (ALF is pending).	Suspended on Stock Exchange	The Annual Listing Fees (ALF) has not been paid by the company and is suspended
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	As informed by the management, company has appointed Whole - time Company Secretary of January 21, 2021.
3.	Regulation 23(9)- Related Party Disclosure for Quarter ended September 30, 2020	Delayed Submission	Fine was levied of Rs. 3,00,900/-	As informed by the management, fine 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, fine 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, fine is pending for payment



6.	Regulation 19 – of and Constitution Nomination Remuneration Committee	Non-compliance with the constitution of the Nomination and Remuneration Committee	Fine was levied of Rs. 2,12,400/-	As informed by the management, fine is pending for payment to stock exchange
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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	Non-compliance with Regulation 6(1), 13, 19, 23(9), 31 and 34	Warning letter of Freezing of Promoter shareholding and fine was levied for various non compliances of SEBI (LODR) Regulation, 2015	As informed by the management, payment of Fine 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 also defaulted in payment of Annual Listing Fee on time because of which the listed entity is suspended from BSE.

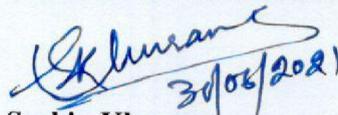
*Website of the company is de-activated as on date of this report for non-payment of website fee

(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 March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non-compliance with Regulation 13	Payment of Annual Listing Fees is pending.	As informed by the management, payment of Annual Listing Fee is in process	Company is suspended on Stock Exchange
2.	Non-Compliance with Regulation 6(1) w.r.t appointment of Whole-time Company Secretary	<i>The Company has not appointed the Whole - Time Company Secretary as the Compliance Officer</i>	Company Appointment Whole-time Company Secretary on January 21, 2021	Company has complied with regulation 6(1) of SEBI (LODR) Regulations, 2015
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
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

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


30/06/2021
Sachin Khurana
Proprietor



M. No.: F10098; CP No.:13212
UDIN - F010098C000553432

Date: 30/06/2021
Place: New Delhi