

ANIL SOMANI & ASSOCIATES

Company Secretaries

D-94, 1st Floor, Indra Market, Bhilwara, Rajasthan - 311001

Email Id: corporatesolutions14@gmail.com, (M) 09166611876

Secretarial compliance report of A Infrastructure Limited **for the year ended 31st March, 2022**

1. We have examined: -

- (a) all the documents and records made available to us and explanation provided by **A Infrastructure Limited** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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");

2. The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **N.A.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **N.A.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **N.A.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **N.A.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And based on the above examination, we 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
1.	Regulation 27 of SEBI (LODR) Regulations, 2015	Delayed filing of Corporate Governance Report for the quarter ended September 2021	The Company has filed Corporate Governance Report for the quarter ended September 2021 delayed by 09 days on 30.10.2021

- (b) 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 our examination of those records.
- (c) The following are the details of action taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI 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:

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.	BSE Ltd.	Late submission of Corporate Governance Report For the quarter ended September 2021	BSE Ltd. imposed fine of Rs. 18000/- plus GST	The Company has paid fine of Rs. 18000/- plus GST after TDS deduction.
2.	BSE Ltd.	Non-payment of annual listing fees by VISHVJYOTI TRADING LTD. to BSE Ltd.	Demat account of Shri Sanjay Kumar Kanoria and Smt. Priyadarshini Kanoria were freezed due to Non-payment of annual listing fees by VISHVJYOTI TRADING LTD. to BSE Ltd.	Demat account of Shri Sanjay Kumar Kanoria and Smt. Priyadarshini Kanoria were freezed due to Non-payment of annual listing fees by VISHVJYOTI TRADING LTD. to BSE Ltd. The Management of A Infrastructure Ltd. has informed that Shri Sanjay Kumar Kanoria and Smt. Priyadarshini Kanoria were not associated with VISHVJYOTI TRADING LTD. As they sold their shareholding in year 2014 and the same was also informed the BSE Ltd. with a request to de-freeze the demat accounts.

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable			

For **Anil Somani & Associates**
Company Secretaries
PR 1869/2022

ANIL KUMAR SOMANI
SOMANI

Digitally signed by ANIL KUMAR SOMANI
Date: 2022.05.07
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Anil Kumar Somani

ACS: 36055

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UDIN: A036055D000351381

Place: Bhilwara

Date: 20th May, 2022