

Ajmera Realty & Infra India Limited

Regd. Office: "Citi Mall", 2nd Floor, Link Road, Andheri (West), Mumbai 400 053
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CIN NO. L27104 MH 1985 PLC035659



Ref: SEC/ARIL/BSE-NSE/2021-22

Date: 30TH June, 2021

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| The Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai – 400 001 Script Code : 513349 | National Stock Exchange of India Limited 5 th Floor, Exchange Plaza, Bandra Kurla Complex Bandra(East) Mumbai-400051 Script Code : AJMERA |
|--|--|

Ref: SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (LODR) Reg. 2015 read with SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019; we are hereby submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by Mrs. Shreya Shah, Practicing Company Secretary and the Secretarial Auditor of the Company.

We request you to take the above record.

Thanking You.

Yours faithfully,

For AJMERA REALTY & INFRA INDIA LIMITED

A handwritten signature in black ink, appearing to read 'Harshini D. Ajmera'.

**HARSHINI D. AJMERA
COMPAY SECRETARY & COMPLIANCE OFFICER**

Secretarial Compliance Report
of
Ajmera Realty & Infra India Limited
(CIN: L27104MH1985PLC035659)
for the year ended 31st March, 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, **Shreya Shah** have examined:

- (a) the documents and records made available to me and explanation provided by **Ajmera Realty & Infra India Limited** (“the listed entity”),
- (b) the filings/submissions made by the listed entity to BSE Ltd. and National Stock Exchange of India Ltd,
- (c) website of the listed entity, and
- (d) other books, papers, minute books and other records maintained by the Company and produced before me for verification which has been relied upon to make this certification,

The following Regulations prescribed under the SEBI Act, whose provisions and the circulars/ guidelines issued thereunder, have been examined:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations, 2015”);
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations, 2015”); and
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

There were no actions/ events in pursuance of following Regulations prescribed under SEBI Act, requiring compliance thereof by the Company during the year ended 31st March, 2021 (“Period”) under review:

- (a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- (f) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

and based on the above examination and verification of the documents and records produced before me and according to the information and explanations given to me by the Company, I hereby report that, during the Period under review:

- (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:

SHREYA SHAH
Practising Company Secretary

| Sr. No. | Compliance Requirement (Regulations/ circulars /guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|---------|--|--|---|
| 1 | Regulation 47 read with Regulation 30 with reference to disclosure of events specified under Clause 12 of Para A of Part A of Schedule III of SEBI (LODR), Regulations, 2015 | Clippings of Newspaper publications referring to the intimation of Board Meeting held to approve Financial Results for the quarter ended 30 th September 2020 were not submitted to the stock exchanges | The intimation of Board Meeting held on 6 th November, 2020 was published in the newspapers but the clipping of said newspapers was inadvertently not submitted to the stock exchanges |

- (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) No actions were taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures (SOP) issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No. | Observations/ Remarks of the Practicing Company Secretary in previous reports | Observations made in the secretarial compliance report for the year ended | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|---|---|--|--|
| 1 | Clause (c)(2) of Part “C” of Schedule V read with Regulation 34 (3) of SEBI (LODR), 2015 – Details on “separate names of the listed entities where the person is a director and the category of directorship” were not incorporated in the Annual Report for FY 18-19. | Year ended 31 st March, 2020 | No action taken by the company | According to explanation given by the company, it was not feasible to take corrective action |



SHREYA SHAH
Practising Company Secretary

| Sr. No. | Observations/ Remarks of the Practising Company Secretary in previous reports | Observations made in the secretarial compliance report for the year ended | Actions taken by the listed entity, if any | Comments of the Practising Company Secretary on the actions taken by the listed entity |
|----------------|---|--|---|---|
| 2 | Regulation 31A(8) of SEBI (LODR), 2015 Receipt of request by the promoter seeking re-classification from “promoter” group to “non-promoter” was intimated to stock exchanges with delay of more than twenty four hours | Year ended 31 st March, 2020 | The Company submitted the intimation for receipt of request from the promoter seeking re-classification from “promoter” group to “non-promoter” to the stock exchange | The Company has taken action on realization of the unintentional delay caused. |

Place: Mumbai
Date: 30th June, 2021




Shreya Shah
Practising Company Secretary
ACS No.: 39409/CoP No.: 15859
UDIN: A039409C000545904

Note: Due to restricted movement amid COVID-19 pandemic, no compliance documents were verified physically at the Company’s premises for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode.