

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/2020-21

Date: 3rd July, 2020

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

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020

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, 2020, issued by Mr. Haresh Sanghvi, 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

Ajmera
HARSHINI D. AJMERA
COMPLIANCE OFFICER

Encl: as attached

**Secretarial Compliance Report of
Ajmera Realty & Infra India Limited
(CIN: L27104MH1985PLC035659)
for the year ended 31st March, 2020**

[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, **Haresh Sanghvi** have examined:

- (a) all 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 (“SEBI (LODR), 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; 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 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 (Buyback of Securities) Regulations, 2018;
- (c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (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:-

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 34 (3) read with Schedule V of SEBI (LODR), 2015	Details on “separate names of the listed entities where the person is a director and the category of directorship” in accordance of Schedule V of SEBI (LODR), 2015 are not incorporated in the Annual Report.	The required details were incorporated in the original signed copy of Annual Report for FY 18-19 but were inadvertently missed out in the printed version of the said Report.
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.	The delay in filing intimation was caused due to inability of the compliance officer to reach the office as well as access the system remotely for consecutive two days because of heavy rainfall in Mumbai and unexpected power failure throughout weekend at the office premises. The application seeking reclassification was approved by the Stock Exchanges after considering the above clarification that the delay was not intentional but caused only due to exceptional circumstances.

- (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 issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.



Haresh Sanghvi
Practicing Company Secretary

(d) Since no observations were made in previous reports, the reporting of actions by the listed entity to comply with the same, does not arise during the Review period.

Place: Mumbai

Date: 27th June, 2020



Haresh Sanghvi

Haresh Sanghvi
Practicing Company Secretary
FCS No.: 2259/CoP No.: 3675
UDIN: F002259B000401878

Note: Due to ongoing COVID19 pandemic and consequent lock-down imposed, I could not verify the compliance documents physically for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode.