

Secretarial Compliance Report
of
Ajmera Realty & Infra India Limited
(CIN: L27104MH1985PLC035659)
for the year ended 31st March, 2022

[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, 2022 (“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



SHREYA SHAH
Practising Company Secretary

- 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 Practising Company Secretary
1	Regulation 30 read with Clause 2 of Part A of Schedule III of LODR Regulations, 2015	The Outcome of the Board Meeting dated 25 th May, 2021, at which the audited financial results for the year ended 31 st March, 2021 were approved, was submitted to the stock exchanges with delay.	As per the explanation given by the Company, the delay of about five minutes in submitting the outcome of the Board Meeting to NSE was caused due to technical glitch in internet connection at the Company's office, delaying receipt of the OTP for log-in on the Stock Exchange's portal and prolonging the upload processing time. No explanation was called for by the Stock Exchanges in this regard.



- (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:



SHREYA SHAH
Practising Company Secretary

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	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 The intimation of Board Meeting held on 6th November, 2020 was published in the newspapers but the clipping of said newspapers was inadvertently not submitted to the stock exchanges	Year ended 31 st March, 2021	No action taken by the company	According to explanation given by the company, it was not feasible to take corrective action

Place: Mumbai
Date: 19th May 2022



Shreya Shah
Practicing Company Secretary
ACS No.: 39409/CoP No.: 15859
UDIN: A039409D000317412