

**RUCHI INFRASTRUCTURE LTD.**

101, The Horizon, 1st Floor, Nath Mandir Road,
11/5, South Tukoganj, Indore - 452 001 (M.P.)
Tel.: 91-731-4755209, 4755227
CIN - L65990MH1984PLC033878

RIL/2022

25th May, 2022

To,
BSE Ltd.
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai - 400 001

National Stock Exchange of India Ltd.
"Exchange Plaza",
Bandra- Kurla Complex,
Bandra (E),
Mumbai - 400 051

Dear Sirs,


Ref: Regulation 24A(2): Secretarial Compliance Report for the year ended 31st March, 2022

Pursuant to provisions of Regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please do find enclosed herewith Secretarial Compliance Report for the financial year ended on 31st March, 2022.

Kindly acknowledge the receipt hereof.

Thanking you,

Yours faithfully,
For Ruchi Infrastructure Limited


Ashish Mehta
Company Secretary

Encl: As above

**SECRETARIAL COMPLIANCE REPORT
RUCHI INFRASTRUCTURE LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022**

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

I have examined:

- (a) all the documents and records made available to us and explanation provided by **Ruchi Infrastructure Limited** ("the listed entity") through digital mode,
- (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");

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

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

As per the representations made by the management and relied upon by me, during the period under review, provisions of the following regulations were not applicable to the Company:

- (a) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

- (d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (e) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021

and based on the above examination, I 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 Requirements (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 31 (2) of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	Non-compliance related to 100% Promoter shareholding in Demat.	The Shareholdings of the Promoter (s) and promoter group are not 100% in dematerialized form.

- (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) 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:

Sr. No	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any.
None				



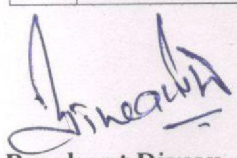
PRASHANT DIWAN

B.Com, LL.B, FCS, AICWA
Practicing Company Secretary

B-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observation of the Practicing Company Secretary in the 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	The Shareholdings of the Promoter (s) and promoter group are not 100% in dematerialized form	31.03.2019 31.03.2020 31.03.2021	The Company has advised Promoter (s) and promoter group to dematerialize their entire shareholding at the earliest.	The Company is required to take appropriate steps immediately to convert Physical shares of Promoter (s) and promoter group into demat form.
2	The Board of Directors of the Company was required to comprise of not less than six directors w.e.f. 1 st April, 2020.	31.03.2021	The Company has complied w.e.f. 21 st August, 2020	NIL


CS Prashant Diwan
Practising Company Secretary
FCS: 1403 CP: 1979



PR: 1683/2022
UDIN: F001403D000389142

Date: 25-05-2022
Place: Mumbai

This report is to be read with our letter of even date which is annexed as **Annexure A** and forms an integral part of this report.

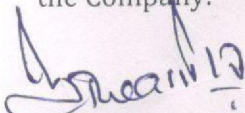
PRASHANT DIWANB.Com, LL.B, FCS, AICWA
Practicing Company SecretaryB-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

Annexure A

**SECRETARIAL COMPLIANCE REPORT OF
RUCHI INFRASTRUCTURE LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2022***[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]*

My report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. My examination was limited to the verification of procedures on test basis.
5. The Secretarial Compliance Report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
6. I have not carried out the physical verification of any records due to prevailing conditions of COVID 2019 in the country. I have relied on the records as made available by the Company through digital mode as well as I have also relied on the Management representation made by the Company.


CS Prashant Diwan
Practising Company Secretary
FCS: 1403 CP: 1979



PR: 1683/2022
UDIN: F001403D000389142

Date: 25-05-2022
Place: Mumbai



RUCHI INFRASTRUCTURE LTD.

101, The Horizon, 1st Floor, Nath Mandir Road,
11/5, South Tukoganj, Indore - 452 001 (M.P.)
Tel.: 91-731-4755209, 4755227
CIN - L65990MH1984PLC033878

RIL/2021

30th June, 2021

To,
BSE Ltd.
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai – 400 001

National Stock Exchange of India Ltd.
“Exchange Plaza”,
Bandra- Kurla Complex,
Bandra (E),
Mumbai – 400 051

Dear Sirs,

Ref: Regulation 24A(2): Secretarial Compliance Report for the year ended 31st March, 2021

Pursuant to provisions of Regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please do find enclosed herewith Secretarial Compliance Report for the financial year ended on 31st March, 2021.

Kindly acknowledge the receipt hereof.

Thanking you,

Yours faithfully,
For Ruchi Infrastructure Limited

Ashish Mehta
Digitally signed
by Ashish Mehta
Date: 2021.06.30
15:23:40 +05'30'
Ashish Mehta
Company Secretary

Encl: As above

PRASHANT DIWANB.Com, LL.B, FCS, AICWA
Practicing Company SecretaryB-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067**SECRETARIAL COMPLIANCE REPORT OF RUCHI INFRASTRUCTURE LIMITED FOR THE YEAR
ENDED 31ST MARCH, 2021***[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]*

I have examined:

- (a) all the documents and records made available to us and explanation provided by **Ruchi Infrastructure Limited** ("the listed entity") through digital mode,
- (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, 2021 ("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");

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

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

As per the representations made by the management and relied upon by me, during the period under review, provisions of the following regulations were not applicable to the Company:

- (a) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;



PRASHANT DIWAN

B.Com, LL.B, FCS, AICWA
Practicing Company Secretary

B-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

- (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (e) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

and based on the above examination, I 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 Requirements (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 17 (1) (c) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	Improper constitution of Board	The Board of Directors of the Company was required to comprise of not less than six directors w.e.f. 1 st April, 2020 however the same was complied w.e.f. 21 st August, 2020.
2	Regulation 31 (2) of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	Non-compliance related to 100% Promoter shareholding in Demat.	The Shareholdings of the Promoter (s) and promoter group are not 100% in dematerialized form.

- (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) 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:

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Practicing Company Secretary

B-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

Sr. No	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	NSE	Regulation 17 (1) (c) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 The board of directors of the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.	<u>For quarter ended June 30, 2020</u> Fine levied Rs. 5,000/- per day till the date of compliance amounting to Rs. 5,36,900/- (including Rs. 81,900/- GST) <u>For the quarter ended September 2020</u> Fine levied Rs. 5,000/- per day till the date of compliance amounting to Rs. 3,00,900/- (including Rs. 45,900/- GST)	The Company has paid the said Fine for quarter ended June 30, 2020, however the Company has made an application to NSE for waiving off the Fine for quarter ended June and September and later on NSE has accepted the application and waived the Fine.
2	BSE	Regulation 17 (1) (c) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 The board of directors of the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.	<u>For quarter ended June 30, 2020</u> Fine levied Rs. 5,000/- per day till the date of compliance amounting to Rs. 5,36,900/- (including Rs. 81,900/- GST) <u>For the quarter ended September 2020</u> Fine levied Rs. 5,000/- per day till the date of compliance amounting to Rs. 3,00,900/- (including Rs. 45,900/- GST)	BSE has waived the penalty on the application made by the Company

PRASHANT DIWAN

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Practicing Company Secretary

B-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observation of the Practicing Company Secretary in the 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	The Shareholdings of the Promoter (s) and promoter group are not 100% in dematerialized form	31.03.2019 31.03.2020	The Company has advised Promoter (s) and promoter group to dematerialize their entire shareholding at the earliest.	The Company is required to take appropriate steps immediately to convert Physical shares of Promoter (s) and promoter group into demat form.



CS Prashant Diwan
Practising Company Secretary
FCS: 1403 CP: 1979



PR: 530/2017

UDIN: F001403C000547498

Date: 30.06.2021

Place: Mumbai

This report is to be read with our letter of even date which is annexed as **Annexure A** and forms an integral part of this report.

PRASHANT DIWAN

B.Com, LL.B, FCS, AICWA
Practicing Company Secretary

B-703/704, Anand Sagar
M. G. Road, Kandivali (W), Mumbai 400067

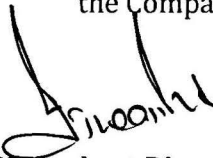
Annexure A

**SECRETARIAL COMPLIANCE REPORT OF RUCHI INFRASTRUCTURE LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

My report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. My examination was limited to the verification of procedures on test basis.
5. The Secretarial Compliance Report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
6. I have not carried out the physical verification of any records due to prevailing conditions of COVID 2019 in the country. I have relied on the records as made available by the Company through digital mode as well as I have also relied on the Management representation made by the Company.


CS Prashant Diwan
Practicing Company Secretary
FCS: 1403 CP: 1979



PR: 530/2017
UDIN: F001403C000547498

Date: 30.06.2021
Place: Mumbai



RUCHI INFRASTRUCTURE LTD.

101, The Horizon, 1st Floor, Nath Mandir Road,
11/5, South Tukoganj, Indore - 452 001 (M.P.)
Tel.: 91-731-4755209, 4755227
CIN - L65990MH1984PLC033878

RIL/2020

29th July, 2020

To,
BSE Ltd.
Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai – 400 001

National Stock Exchange of India Ltd.
“Exchange Plaza”,
Bandra- Kurla Complex,
Bandra (E),
Mumbai – 400 051

Dear Sirs,

Re: Annual Secretarial Compliance Report

With reference to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended on 31st March, 2020.

Kindly acknowledge the receipt hereof.

Thanking you,

Yours faithfully,

For Ruchi Infrastructure Limited

Ashish

Mehta

Ashish Mehta

Company Secretary

Digitally signed by Ashish Mehta
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b96ec3ab1d34278260b4a7426f958f753
e6242, postalCode=452018, st=Madhya
Pradesh,
serialNumber=b3b0ddc436c37d0baac
1320990d5f13ba0dc1bc0d94e1877a08f1
2812b30642ee, cn=Ashish Mehta
Date: 2020.07.29 10:44:32 +05'30'

Encl: As above

**SECRETARIAL COMPLIANCE REPORT OF RUCHI INFRASTRUCTURE LIMITED FOR THE YEAR
ENDED 31ST MARCH, 2020**

[Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019]

I have examined:

- (a) all the documents and records made available to us and explanation provided by **Ruchi 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, 2020 ("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");

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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (e) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

As per the representations made by the management and relied upon by me, during the period under review, provisions of the following regulations were not applicable to the Company:

- (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 (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(e) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013;

(f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

and based on the above examination, I 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 Requirements (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 31 (2) of SEBI (Listing obligations and Disclosure Requirements) Regulation, 2015	Out of total Promoter (s) and promoter group shareholding only 67.13% of the Shares are in dematerialized form.	The Shareholdings of the Promoter (s)and promoter group are not 100% in dematerialized form

(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) 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:

Sr. No	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any.
None				

PRASHANT DIWAN

B.Com, LL.B, FCS, AICWA

Practicing Company Secretary

B-703/704, AnandSagar

M. G. Road, Kandivali (W), Mumbai 400067

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observation of the Practicing Company Secretary in the 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	The Shareholdings of the Promoter (s) and promoter group are not 100% in dematerialized form	31.03.2019	The Company has advised Promoter (s) and promoter group to dematerialize their entire shareholding at the earliest	The Company is required to take appropriate steps to convert Physical shares of Promoter (s) and promoter group into demat form.

PRASHANT
DEVENDRA
DIWAN

Digitally signed by PRASHANT DEVENDRA
DIWAN
DN: cn=Prashant
Devendra Diwan,
serialNumber=0024C5F3145D79A0B437
028F3AC7A0A00B0B0A77A0B43C0A2
04762C, c=PRASHANT DEVENDRA
DIWAN
Date: 2020.07.28 12:29:39 +05'30'

CS Prashant Diwan
Practising Company Secretary
FCS: 1403 CP: 1979

PR: 530/2017

UDIN: F001403B000514454

Date: 28.07.2020

Place: Mumbai

This report is to be read with our letter of even date which is annexed as **Annexure A** and forms an integral part of this report.



PRASHANT DIWAN

B.Com, LL.B, FCS, AICWA

Practicing Company Secretary

B-703/704, AnandSagar

M. G. Road, Kandivali (W), Mumbai 400067

Annexure A

My report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
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4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. My examination was limited to the verification of procedures on test basis.
5. The Secretarial Compliance Report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
6. I have not carried out the physical verification of any records due to prevailing conditions of COVID 2019 in the country. I have relied on the records as made available by the Company through digital mode as well as I have also relied on the Management representation made by the Company.

PRASHANT
DEVENDR
A DIWAN

Digitally signed by PRASHANT DEVENDRA
DIWAN
DN: cn=PRASHANT DEVENDRA
DEVENDRA, o=Prashant Diwan,
2.5.4.20=c@prashantdiwan.com,
email=prashantdiwan@gmail.com,
c=IN

CS PrashantDiwan
Practicing Company Secretary
FCS: 1403 CP: 1979

PR: 530/2017

UDIN: F001403B000514454

Date: 28.07.2020

Place: Mumbai