

Date: 30.05.2023

To,
The Manager,
Department of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai-400 001

To,
The Asst. Vice President
National Stock Exchange of India Ltd
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051

Sub: Filing of Secretarial Compliance Report for the financial year ended 31st March, 2023.

Dear Sir/Madam,

Enclosed please find herewith Secretarial Compliance Report issued by Practicing Company Secretary for the year ended 31st March, 2023, pursuant to Circular No. CIR/CFD/CMDI/27/2019 dated 08/02/2019 issued by Securities and Exchange Board of India read with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the aforesaid information on record and oblige.

Thanking you,
Yours truly,
For **Tantia Constructions Limited**

Priti Toddi
Company Secretary
A-33367

Encl: As above

An ISO 9001 : 2008
Registered Firm



Registered & Corporate Office

DD-30, Sector-1, Salt Lake City, Kolkata - 700 064, India
Tel : +91 33 4019 0000
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CIN - L74210WB1964PLC026284

C r e a t i n g C o r e I n f r a s t r u c t u r e



MR & Associates

COMPANY SECRETARIES

46, B. B. Ganguly Street, 406, Kolkata - 700 012

Tel No: 033 2237 9517 / 4007 7907

Email : mrasso1996@gmail.com / goenkamohan@gmail.com

**SECRETARIAL COMPLIANCE REPORT
OF
TANTIA CONSTRUCTIONS LTD
FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2023**

To,
The Members,
TANTIA CONSTRUCTIONS LTD.
BLOCK DD 30 SECTOR 1 SALT LAKE CITY
7TH FLOOR KOLKATA – 700064
West Bengal

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **TANTIA CONSTRUCTIONS LTD.** (hereinafter referred as 'the listed entity'), having its Registered Office at Block DD 30 Sector 1 Salt Lake City, 7th Floor Kolkata – 700064. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, partially complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, MR & Associates, a firm of Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. **TANTIA CONSTRUCTIONS LTD.** ("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 on 31st March, 2023("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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not Applicable as there were no reportable events during the Financial Year under review;**
- (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; -**Not Applicable as there were no reportable events during the Financial Year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; -**Not Applicable as there were no reportable events during the Financial Year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; -**Not Applicable as there were no reportable events during the Financial Year under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.

and circulars/ guidelines issued thereunder, and based on the above examination, the listed entity has partially complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.

We hereby report that, during the Review Period, the National Company Law Tribunal, Kolkata bench has ordered the commencement of a corporate insolvency resolution process (CIRP) in respect of the Company on 13th March, 2019 and thereafter there were many irregularities regarding the compliance of the provisions of the law as there was no proper mechanism of the Board processes as the power of the Board stand suspended. As per the explanation and information provided by the management, it may be pertinent to note here that the implementation of the resolution plan was being delayed due to certain anomalies related to the promoters shareholding wherein 99,19,032 no. of equity shares out of 2,09,47,530 equity shares issued to promoters, do not have listing and trading approval from both the stock exchanges. Owing to the anomalies in the subject shares, the promoter's shareholding could not to be transferred in the name of the successful Resolution Applicant. A meeting of the Monitoring Committee was convened vide an order of the Hon'ble NCLT, Kolkata Bench dated 14th November 2022, wherein decisions were taken to resolve the issues being faced in the implementation of the approved resolution plan. Hence, the Monitoring Committee has apprised the Hon'ble NCLT, the outcome of the meeting vide an application filed by it on 28th December 2022. which inter alia included prayers for resolving the above stated anomaly of 9919032 Equity shares. The Adjudicating Authority vide its order dated 1st day of May 2023 read with the Corrigendum order dated 18th day of May 2023, duly agreed with the prayers sought by



the MC. The MC is currently in the process of implementing the Resolution Plan as per the directions issued by Adjudicating Authority as per the information received from the Company.

I (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, subject to the following observations as specified below in addition to the above mentioned points: -

Sr. No.	Compliance Requirement (Regulations/circulars / guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Detail of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As per Annexure A										

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

Sr. No.	Compliance Requirement (Regulations/circulars / guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As per Annexure B										

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks of the Practicing Company Secretary
1.	Compliances with the following conditions while appointing/re-appointing an auditor		



	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	N/A	<p>There was no such instances of resignation of auditor during the Financial Year 2022-23.</p> <p><i>However, The listed entity has not complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has not modified the terms of appointment of its statutory auditors.</i></p>
2	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p>	N/A	<p>There was no such instances of resignation of auditor during the Financial Year 2022-23.</p>



	<p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	N/A	There was no such instances of resignation of auditor during the Financial Year 2022-23.

III. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks of the Practicing Company Secretary
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	No	Since the National Company Law Tribunal, Kolkata bench has ordered the commencement of a corporate insolvency resolution process (CIRP) in respect of the Company on 13th March, 2019, thereafter there were many irregularities regarding the compliance of the provisions of the law as there is no proper mechanism of the Board processes
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. 	Yes	



	<ul style="list-style-type: none"> All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	No	All the policies are not updated in conformity with SEBI Regulations.
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website. Timely dissemination of the documents/information under a separate section on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website. 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>The Company is generally compliant with the timeliness of dissemination of information.</p> <p>The company's web address is given in the website affirmation in the annual corporate governance report under Regulation 27(2) for the F.Y 21-22 submitted during the year under review.</p>
4.	<p>Disqualification of Director:</p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</p>	Yes	
5.	<p>To examine details related to Subsidiaries of listed entities:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</p>	<p>N/A</p> <p>Yes</p>	<p>The Company does not have any material subsidiary.</p>
6.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	N/A	<p>The Power of the Board of Director after the commencement of CIR process stands suspended.</p>



8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p>	N/A	After the commencement of CIRP process, the power of Audit Committee stand suspend, no meetings of the Committee have been held during the year under review.
9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	As per the information provided by the management all the material information u/r 30 were intimated to the stock exchange within time period.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	No	No system maintained for structured digital database, Further, as per the clarification received from the management, the Monitoring Committee overseeing the day-to-day operations of the Company and the financial data is being shared with various consultants, lawyers, creditors, resolution applicant, etc., hence, the Company is not in a position to comply with the requirements of SDD under PIT Regulations.
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.</p>	Yes	As stated in "Annexure-A"



12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	As stated in "Annexure-A"
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Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place : Kolkata
Date : 30.05.2023

For MR & Associates
Company Secretaries
A Peer Reviewed Firm
Peer Review Certificate No.: 720/2020



[Signature]

M R Goenka
Partner
C P No.: 2551
UDIN: F004515E000378284

Annexure- A

- I. (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, subject to the following observations as specified below in addition to the other mentioned points in the report: -

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount (in Rs.)	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year	Reg. 24A of SEBI (LODR) Regulations, 2015	Delayed compliance of the said regulation	-	-	Delayed compliance of the said regulations.	-	The company has not submitted the Annual Secretarial Compliance Report within the stipulated time period mentioned in Reg. 24A of SEBI (LODR) Regulations, 2015, for the financial year 2021-22 during the period under review.	Due to delay in finalization of Accounts	
2	The listed entity shall submit to the stock exchanges disclosures of related party transactions	Reg. 23(9) of SEBI (LODR) Regulations, 2015	Delayed submission of the RPT as per said	-	-	The Company has delayed in submitting the Related Party Transactions as per Reg. 23(9) of SEBI (LODR)	-	The Company has submitted with delay the Related Party Transactions as per Reg. 23(9) of SEBI (LODR) Regulations, 2015 for the quarter ended March 2022	Due to delay in finalization of Accounts	-



	The listed entity shall make such disclosures every six months within fifteen days from the date of publication of its standalone and consolidated financial results		provisions.			Regulations, 2015 for the quarter ended March 2022.		during the period under review.		
3	The promoter shall declare on yearly basis that he along with persons acting in concert has not made any encumbrance other than those already disclosed during the year.	Reg-31(4) of SEBI (SAST) Regulations, 2011	Non-compliance of the said provision	-	-	Non submission of the details of encumbered shares of the promoters as per the provisions of the Regulations for the year ended 31.03.2022	-	The company is non-compliant with respect to Reg 31(4) of SEBI (SAST) Regulations, 2011 during the period under review.	Since, no declaration was received from the promoters, so the required disclosure was not submitted to the stock exchange	
4	The listed company shall ensure the constitution and relevant compliances of the Board including appoint of a	Reg 17 and 18 of SEBI (LODR) Reg, 2015	Non-compliance	BSE Limited	Clarification	1. The Company does not have Woman Director on the Board 2. The Company does not have Audit Committee	-	The company is non-compliant with respect to Reg 17 and 18 of SEBI (LODR) Reg, 2015 during the period under review.	The Company was under Corporate Insolvency Resolution Process vide Hon'ble National Company Law Tribunal, Kolkata Bench order dated March 13, 2019, in terms of the provisions	



	woman director and constitution of Audit Committee.								<p>of Insolvency and Bankruptcy Code, 2016 (IBC) and the regulations framed thereunder. Thereafter, pursuant to the Order dated February 24, 2020, the resolution plan submitted for the Corporate Debtor was approved by the Hon'ble NCLT.</p> <p>In terms of the approved resolution plan, a Monitoring Committee (MC) has been constituted for overseeing and monitoring the implementation of the resolution plan and successful revival of the Company and the powers of the Board of Directors continues to remain suspended.</p>	
5	Provisions pertaining to - the composition of	Reg 17(1), 17(2), 18(1),	Non – compliance with the said	BSE Limited	Finevi de notice dated	Non-compliance with requirements	4035600	The Company is non-compliant during the period under review with respect to the	Same as pt. 4 above	-



	the Board and woman director, - The no. of Board meetings. - the constitution of Audit Committee - the constitution of Nomination and remuneration committee - the constitution of Stakeholders Relationship Committee.	19(1)/19 (2), 20(2)/(2 A) of SEBI (LODR) Reg, 2015	provisions for the quarter ended 30.09.2022		21.11.2022	pertaining to – the composition of the Board including failure to appoint woman director, - The no. of Board meetings. -the constitution of Audit Committee -the constitution of Nomination and remuneration committee -the constitution of Stakeholders Relationship Committee.		said provisions due to initiation of CIR Process.		
6	Provisions pertaining to - the composition of the Board and woman director, - The no. of Board meetings.	Reg 17(1), 17(2), 18(1), 19(1)/19 (2), 20(2)/(2 A) of	Non – compliance with the said provisions for the	National Stock Exchange Limited vide notice dated	Fine	Non-compliance with requirements pertaining to – the composition of the Board	1205960	The Company is non-compliant with respect to the said provisions during the period under review due to initiation of CIR Process.	Same as pt. 4 above	-



	<ul style="list-style-type: none"> - the constitution of Audit Committee - the constitution of Nomination and remuneration committee - the constitution of Stakeholders Relationship Committee. 	SEBI (LODR) Reg, 2015	quarter ended 31.12.2022	21.02.2023		<ul style="list-style-type: none"> including failure to appoint woman director, - The no. of Board meetings. - the constitution of Audit Committee - the constitution of Nomination and remuneration committee - the constitution of Stakeholders Relationship Committee. 				
7	Specific disclosures are required under the SEBI LODR Regulations in certain matters such as delay	SEBI Circular CIR/CFD/CMD/93/2017 dated August 4, 2017.	Non Submission of the said disclosure.	BSE Limited	Clarification dated 20.02.2023	Non-submission of disclosures made under SEBI Circular CIR/CFD/CMD/93/2017 dated August 4, 2017 regarding default of loans,	-	Company was admitted to CIRP Process vide Hon'ble NCLT Order Dated 13 March, 2019, the SEBI Circular SEBI/HO/CFD/CMD 1/CIR/P/2019/140 dated November 21, 2019 was not	Since the said provisions was not applicable to the Company due to its admission into CIRP Process	-



	/default in payment of interest /principal on debt securities, including listed Non-Convertible Debentures, listed Non-Convertible Redeemable Preference Shares, Foreign Currency Convertible Bonds (FCCBs) etc.					declaration of fraudulent account, etc.		applicable to the Company		
8	The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other	Reg 33 of SEBI (LODR) Reg, 2015	Non-compliance of Reg 33 for the quarter ended on 30.06.2022	BSE Limited	Fine vide notice dated 15.07.2022	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015.	271400	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015 of March 2022 and quarterly financial results for June 2022, September 2022 and December 2022 quarter of the F.Y	Due to delay in finalization of Accounts	-



	than the last quarter							2022-23. As per the management explanation the accounts were not finalized on time.		
9	The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter	Reg 33 of SEBI (LODR) Reg, 2015	Non-compliance of Reg 33 for the quarter ended on 30.06.2022	National Stock Exchange Limited	Fine vide notice dated 14.09.2022	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015.	171100	Delayed compliance of submission to the stock exchange of the audited annual financial result under Reg. 33 of SEBI (LODR) Regulations, 2015 of March 2022 and quarterly financial results for June 2022, September 2022 and December 2022 quarter of the F.Y 2022-23. As per the management explanation the accounts were not finalized on time.	Due to delay in finalization of Accounts	-



Annexure- B

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

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The listed entity shall submit the financial results in the following manner: (a) The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter	Reg 33 of SEBI (LODR) Regulations, 2015	Delayed Compliance	-	-	2018-19, 2020-21 and 2021-22 Delayed submission to the stock exchange of the audited annual financial result of March, 2018, March 2020 and March 2021 and quarterly financial results for June, September and December of quarter of the F.Y 2020-21 and 2021-22.	-	The same has been complied with delay during the period under review.	Due to delay in finalization of Accounts	This is a continuing default in the financial year 2022-2023 also.



2	Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.	Clause 4(2) of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015	Non-compliance of closure of trading window	-	-	2019-20 and 2021-22. As per Clause 4(2) of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 Minimum Standards for Code of Conduct Trading, restriction period be made applicable from the end of every quarter till 48 hours after the declaration of financial results.	-	The Company is not closing the trading window specified in the said regulation of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Since the Financial Results was not adopted within the due date, the disclosure for closure of trading window is not given separately, but the trading window was closed as per PIT Regulations	This is a continuing default in the financial year 2022-2023 also.
3	The listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s)					2020-21 and 2021-22 Compliance report on corporate governance not Submitted to National Stock Exchange of India Limited and submitted with delay to the BSE	-	The same has been complied with delay during the period under review.	Since the powers Board of Directors of the Company stands dissolved, due to non-optimum combination of directors as required under SEBI LODR Regulations, the Company was	This is not a continuing default for the quarters of the financial year 2022-2023 also.



	within twenty one days from the end of each quarter.					Ltd. for the all the quarters of F.Y 2020-21 and 2021-22.			not able to validate the XBRL file for Corporate Governance Report.	
4	The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the Board or the recognised stock exchange(s).	Regulation 14 of the SEBI (LODR) Regulations, 2015.	Non-Compliance of the said provision	-	-	2020-21 and 2021-22 The Listing fee has not been paid by the company to the Stock exchange(s) in which the entity is listed according to the Regulation 14 of the SEBI (LODR) Regulations, 2015.	-	No corrective actions taken by the company.	The fees will be paid in due course of time	This is a continuing default for the financial year 2022-2023 also.
5	The listed company shall ensure the constitution and relevant compliances of the Board and Audit Committees, Nomination and Remuneration Committees and Stakeholder Relationship committee.	Reg 17, 18, 19 and 20 of SEBI (LODR) Regulations, 2015	Non-Compliances of the said provisions	-	-	2021-22 Non-Compliances of the Regulation 17, 18, 19 and 20 of the SEBI (Listing Obligations and Disclosure Requirements) 2015	-	There were no proper Board and the said Committees Process till date.	The Monitoring Committee has been in the office for the period under review with the erstwhile Board of Directors of the Company standing suspended.	This is a continuing default for the financial year 2022-2023 also.



6	The board of directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained.	Clause 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Non Compliance of the said provisions	-	-	2021-22 Non-compliance of Clause 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015		No system of compliance was maintained for the structured digital database.	With the MC overseeing the day-to-day operations of the Company and the financial data is being shared with various consultants, lawyers, creditors, resolution applicant, etc., hence, the Company is not in a position to comply with the requirements of SDD under PIT Regulations.	This is a continuing default in the financial year 2022-2023 also.
7	Every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year	Reg 24A of SEBI (LODR) Regulations, 2015	Delayed submission to the stock exchange	-	-	According to Reg 24A of SEBI (LODR) Regulations, 2015 every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year.	-	The company has not submitted the Annual Secretarial Compliance Report within the stipulated time period.	Due to non-finalization of Accounts	This is a continuing default in the financial year 2022-2023 also.



8	The listed entity shall submit to the stock exchanges disclosures of related party transactions u/r 23(9) of SEBI (LODR) Regulations, 2015 within every six months on the date of publication of its standalone and consolidated financial results.	Reg 23(9) of SEBI (LODR) Regulations, 2015	Non Compliance of submission to the stock exchange	-	-	2021-22 The Company has not submitted the Related Party Transaction as per the said provisions for the half year ended 30.09.2021.		The same has been complied with delay during the period under review.	Due to non-finalization of Accounts	This is a continuing default in the financial year 2022-2023 also.
9	Pursuant to Reg 34 of SEBI (LODR) Regulations, 2015 a copy of the annual report shall be sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders	Reg 34 of SEBI (LODR) Regulations, 2015	Delayed compliance of the said provision	-	-	2021-22 The company has not submitted the Annual Report within the stipulated time period for the financial year 2020-21 during the period under review.	-	The same has been complied with delay during the period under review.	Due to non-finalization of Accounts	This is a continuing default in the financial year 2022-2023 also.

