



May 30, 2019

The Secretary

BSE Limited

P. J. Towers, 1st Floor

Dalal Street,

Mumbai – 400 001

Scrip Code in BSE : **538833**

Sub : Secretarial Compliance Report for the year ended March 31, 2019



Dear Sir,

We enclose in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, the Secretarial Compliance Report of the Company from M/s. Rateria & Associates, Practicing Company Secretary, for the financial year ended March 31, 2019.

Thanking you,

Yours faithfully,

For **Anubhav Infrastructure Limited**

Dinesh Agarwal

(Managing Director)

Din : 00499238

ANUBHAV INFRASTRUCTURE LIMITED

"ANANTA BHAVAN" 3RD FLOOR, R. NO - 303, 94, VIVEKANAND NAGAR, ANDUL ROAD, HOWRAH - 711 109
TEL. : 91.33.3261 3440, 2644-2626, Website : www.anubhavinfrastucture.com E-mail : info@anubhavinfrastucture.com
8232013440 CIN :- L51109WB2006PLC107433



Secretarial Compliance Report of Anubhav Infrastructure Limited
For the Year Ended March 31, 2019.

M/s. Rateria & Associates have examined :

- (a) all the documents and records made available to us and explanation provided by M/s. Anubhav Infrastructure Limited;
- (b) the fillings/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 March 31, 2019 ("Review Period is from April 01, 2018 to March 31, 2019) in respect of the compliance with the provisions of :
 - the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder ; and
 - 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of insider Trading) Regulations, 2015; and
- (e) and circulars / guidelines issued thereunder;

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 issue thereunder, except in respect of matters specified below :-

Sl. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
None			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder in so far as it appears from my / our 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 :

Sl. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations / remarks of the Practicing Company Secretary, if any.
1.	The Bombay Stock Exchange Limited	SEBI direction w.r.t to listed shell companies, BSE Notice No. 20170807-31 dated August 07, 2017 and SEBI vide its letter reference No. SEBI/HO/ISD/ISD/O W/P/2017/18926/1 dated August 09, 2017.	The promoters and Directors in the Company are permitted only to buy the securities of the Company and they shall not sell their existing holding in the Company.	The Company replied to the Notice issued by BSE & SEBI dated August 16, 2017.
2.	The Bombay Stock Exchange Limited	SEBI direction w.r.t to listed shell companies, BSE reference No. SURV/OFL/KM/2017/SHELL/COM P/538833/1 dated October 12, 2017	a. The trading in the securities shall be moved out of Stage VI of GSM framework and further, the securities shall be placed under Stage I of GSM framework with the Exchange Notice No. 20180316-27 dated March 16, 2018. b. An Independent Auditor shall be appointed to conduct forensic audit of the Company for verification, including the credentials / financials of the Company. c. The Company is strictly directed to provide the information / documents as sought by the Exchange within the stipulated time.	The Company has not made any response against the action taken by SEBI & Exchange. Although the Company has replied to the query raised by SEBI & Exchange at from time to time
3.	The Bombay Stock Exchange Limited	SEBI direction w.r.t to listed shell companies, BSE reference No. L/SURV/OFL/KM/COMP/538833/ 2 dated December 29, 2017.	Appointment of Forensic Auditor	From the records and trailing mail it is concluded that the Company has not completely complied with the forensic audit as initiated by SEBI & Exchange till March 31, 2019.





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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year end (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable considering it is the first year of implementation of this report.				

Note :

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations - **Not Applicable.**
2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised / observations – **Not Applicable.**

Place : Kolkata
Date : May 29, 2019

M/s. Rateria & Associates
Practicing Company Secretary

 *Nikita Rateria*
Nikita Rateria
C.P No. 20125
Membership No. 36115