



May 30, 2023

**The Manager**  
**Listing Department**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers, 1st Floor  
Dalal Street,  
Mumbai – 400 001

**Scrip Code in BSE: 538833**

**Sub : Annual Secretarial Compliance Report for the financial year ended March 31, 2023**

Dear Sir/Madam

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, BSE Notice No. 20230316-14 dated March 16, 2023, please find enclosed the Annual Secretarial Compliance Report of the Company dated May 29, 2023 issued by Mrs. Kalpana Tekriwal, Partner of M/s. Kalpana Tekriwal & Associates, Practicing Company Secretaries, for the financial year 2022-23.

This is for your information and records.

Thanking you,

Yours faithfully,

**For Anubhav Infrastructure Limited**

**NIKITA**  
**RATERIA**

Digitally signed by  
NIKITA RATERIA  
Date: 2023.05.30  
12:26:08 +05'30'



Nikita Rateria  
**(Company Secretary)**  
M No. 36115

Encl : As Above

**ANUBHAV INFRASTRUCTURE LIMITED**

1/A, FAKIR DEY LANE, 1ST FLOOR, BOWBAZAR, KOLKATA - 700 012

TEL. : 91 82320 13440, Website : [www.anubhavinfrastucture.com](http://www.anubhavinfrastucture.com) E-mail : [info@anubhavinfrastucture.com](mailto:info@anubhavinfrastucture.com)

CIN :- L51109WB2006PLC107433



# Kalpana Tekriwal & Associates

## Company Secretaries

### Secretarial Compliance Report of M/s. Anubhav Infrastructure Limited

For the financial year ended March 31, 2023

We M/s. Kalpana Tekriwal & Associates have examined:

- all the documents and records made available to us and explanation provided by M/s. Anubhav Infrastructure Limited (CIN: L51109WB2006PLC107433 ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this

certification, for the year ended March 31, 2023 ("Review Period") in respect of 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 :-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the review period)**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable during the review period)**



(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Applicable during the review period)**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) (other regulations as applicable)

and circulars/ guidelines issued thereunder

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 by PCS*
1.	<p><b>Secretarial Standards:</b></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>	Yes	None
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>● All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	Yes	None
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>● The Listed entity is maintaining a functional website</li> <li>● Timely dissemination of the documents/ information under a separate section on the website</li> <li>● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</li> </ul>	Yes	None
4.	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	None
5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <ul style="list-style-type: none"> <li>(a) Identification of material subsidiary companies</li> <li>(b) Disclosure requirement of material as well as other subsidiaries</li> </ul>	NA	Self-Explanatory

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
6.	<p><b>Preservation of Documents:</b></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	None
7.	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	None
8.	<p><b>Related Party Transactions:</b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes	None
9.	<p><b>Disclosure of events or information:</b></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	None
10.	<p><b>Prohibition of Insider Trading:</b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None
11.	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>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 except as provided under separate paragraph herein (**).</p>	Yes	It may be noted that during the year, Stock Exchange has imposed a fine of Rs. 253,700/- consequent to non-appointment of Company Secretary & Compliance officer of the Company as per Regulation 6(1) of SEBI, LODR 2015.

			Due to this Non-Compliance the Exchange has frozen the account of all the Promoters of the Company.
12.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Non-compliance with requirement under Regulation 23(9) of listing regulation and Rs. 342,200/- under SOP regulation 23 (9) pursuant to SEBI SOP circular.

(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)	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.	In pursuance of SEBI (LODR), 2015 listed entity is required to appoint a qualified company secretary as the compliance officer.	Regulation 6(1)	Delay in appointment of Compliance officer	Company has paid fine for the same	Company has paid fine levied by the Stock Exchange	Delay in appointment of Company Secretary as the Compliance officer of the Company as per Regulation 6(1).	253,700/- (including GST)	The Company has delayed in appointment of Company Secretary pursuant to Regulation 6(1) of SEBI (LODR), 2015 for which the Company has paid fine levied by the Stock Exchange.	-	Acknowledged
2.	In pursuance of SEBI (LODR), 2015 listed entity is required to disclose Related party transaction	Regulation 23(9)	Delay in filing related Party Transaction	Company has paid fine for the same	Company has paid fine Levied by the stock exchange	Delay in filing related Party Transaction as per Regulation 23(9).	342,200/- (including GST)	The Company has delayed in filing related Party Transaction as per Regulation 23(9) of SEBI (LODR), 2015 for which the Company has paid fine levied by the Stock Exchange.	-	Acknowledged

(b) The listed entity has 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
NOT APPLICABLE										

Place : Kolkata  
Date : May 29, 2023

Kalpana Tekriwal & Associates  
Practicing Company Secretary  
Membership No. 59722



C.P No. 22484  
PR No. 3366/2023  
UDIN : A059722E000416474