



June 27, 2020

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, 2020

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, 2020.

Thanking you,

Yours faithfully,

For **Anubhav Infrastructure Limited**

Sweta Jain

Sweta Jain

(Company Secretary)

M. No. 58387



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 :- U51109WB2006PLC107433



Secretarial Compliance Report of Anubhav Infrastructure Limited
For the Year Ended March 31, 2020

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2020 dated February 08, 2020, | **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 ("the Listed Entity") CIN : (L51109WB2006PLC107433) and having its Registered Office at "Ananta Bhavan", 94 Vivekananda Nagar, P.O- Podrah, Andul Road, Near Narayana Hospital, 3rd Floor, R.No.303, Howrah – 711 109
- (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, 2020 ("Review Period is from April 01, 2019 to March 31, 2020) 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, | 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	Non-Compliance of Regulation 31 (shareholding pattern) for the quarter ended June 2019	Fine levied pursuant to SEBI SOP circular dated May 03, 2018 is Rs. 9440/- dated August 30, 2019	The Company has paid total fine of Rs. 9440/- levied by the Exchange dated September 19, 2019.
2.	The Bombay Stock Exchange Limited	Late appointment of Company Secretary / Compliance Officer for the quarter ended June 30, 2019.	Fine levied pursuant to SEBI SOP circular dated May 03, 2018 is Rs. 1,07,380/- dated August 14, 2019.	The Company had send the clarification letter in this regard to the exchange dated September 24, 2019 i.e the Compliance officer was being appointed on July 02, 2019 and there was some clerical error in the Reconciliation Report submitted by the Company as per SEBI DP Reg-55A for quarter ended June 30, 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
The Company has not completely complied with the forensic audit as initiated by SEBI & Exchange in the previous year.				

M/s. Rateria & Associates
Practicing Company Secretary



Nikita Rateria

Nikita Rateria
C.P No. 20125

Membership No. 36115

UDIN No.: A036115B000390601

Place : Kolkata

Date : June 27, 2020