

Ajmera Realty & Infra India Limited



Regd. Office : "Citi Mall", Link Road, Andheri (West), Mumbai 400 053.

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CIN No. L27104 MH1985 PLCO35659

Ref: SEC/ARIL/BSE/2019-2020

Date: 28th May, 2019

Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai – 400 001 Script Code : 513349	National Stock Exchange of India Limited 5th Floor, Exchange Plaza, Bandra Kurla Complex Bandra (East) Mumbai-400051 Script Code : Ajmera
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Ref: SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019

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

Dear Sir/Madam,

In terms of clause 3(b)(iii) of the above referred SEBI circular, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2019, issued by Mr. Haresh Sanghvi, Practicing Company Secretary and the Secretarial Auditor of the Company.

We request you to take the above record.

Thanking You.

Yours faithfully,

For AJMERA REALTY & INFRA INDIA LTD


✓ **HARSHINI D AJMERA**
COMPLIANCE OFFICER

Encls: As above

**Secretarial Compliance Report of M/s. Ajmera Realty & Infra India Limited for
the year ended 31st March, 2019**

I, **Haresh Sanghvi** have examined:

- (a) all the documents and records made available to me and explanation provided by **M/s. Ajmera Realty & Infra India Limited** (“the listed entity”);
- (b) the filings/ submissions made by the listed entity to BSE Ltd. and National Stock Exchange of India Ltd.,
- (c) Website of the listed entity, and
- (d) all other books, papers, minute books and other records maintained by the Company and made available to me at the Company’s Registered office which has been relied upon to make this certification,

for the year ended **31st March, 2019** (“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; and
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (effective from 3rd October, 2018).

and circulars/ guidelines issued thereunder;

There were no actions/ events in pursuance of following SEBI Regulations requiring compliance thereof by the Company during the period under review:



Haresh Sanghvi
Practicing Company Secretary

- (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 (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; and
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;


and based on the above examination, I hereby report that, during the period under review:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (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) No actions were 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.
- (d) This being the reporting for the first time since the notification of the requirement to submit this report, reporting on actions to comply with the observations made in previous reports does not arise.

Place: Mumbai

Date: 10th May, 2019




Haresh Sanghvi
Practicing Company Secretary
FCS No.: 2259/CoP No.: 3675