



MARUTI INFRASTRUCTURE LIMITED

802, Surmount, Nr. Iscon Temple, Opp. Reliance Mart, S. G. Highway, Ahmedabad - 380 015.
Phone : 26860740 • E-mail : maruti_infra@yahoo.com
CIN No. : L65910GJ1994PLC023742

28th June, 2021

To,
BSE Limited
Listing Department
Phiroze Jeejeebhoy Tower,
Dalal Street, Mumbai – 400 001

SECURITY CODE: 531540

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended on 31st March, 2021

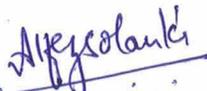
Pursuant to Regulation 24A of SEBI(Listing Obligations and Disclosure Requirements) Regulation 2015, please find enclosed herewith Annual Secretarial Compliance Report for the year ended on 31st March, 2021 issued by M/s Bharat Prajapati & Co., Practicing Company Secretary, Ahmedabad.

You are requested to take the same on record.

Thanking you,

Yours faithfully,

For Maruti Infrastructure Limited


Alfez Solanki

Company Secretary & Compliance Officer



Encl: As above

SECRETARIAL COMPLIANCE REPORT OF MARUTI INFRASTRUCTURE LIMITED FOR THE
YEAR ENDED ON 31ST MARCH, 2021

To,
The Members,
Maruti Infrastructure Limited
802, Surmount Building,
Opp Iscon Mega Mall,
S G Highway,
Ahmedabad-380015.

I, Bharat Prajapati, Proprietor of M/s Bharat Prajapati & Co., Practicing Company Secretaries, Ahmedabad have examined:

- (a) all the documents and records made available to us and explanation provided by **MARUTI INFRASTRUCTURE LIMITED** ("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, 2021 ("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 and amendment thereof;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**Not Applicable to the Company during the Review Period**);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and amendment thereof;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not Applicable to the Company during the Review Period**);



Bharat Prajapati

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to the Company during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the Company during the Review Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to the Company during the Review Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and amendment thereof;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/guidelines issued thereunder;

and 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 issued thereunder. However, the Company has received SOP Notice / freezing of demat account of one of the Promoter & Director of the Company in respect of matters specified below:-

| Sr No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|--------|--|--------------|---|
| 1 | Regulation 17(1), 18(1) and 19(1)/(2) of SEBI (LODR) Regulation 2015. During the year under reviewed, the BSE has issued a SOP Notice and frozen the demat account of the one of the Promoter & Director in respect of non-compliance of above mentioned regulations. | No deviation | As per the records of the Company, (i) the Board was comprised with optimum combination of Executive and Non-Executive Directors with woman Director and half of the Board was comprised of Independent Directors as per Regulation 17(1) of the SEBI (LODR) Regulations, 2015. (ii) The Audit Committee and Nomination and Remuneration Committee were constituted as per Regulation 18(1) and 19(1)/(2) of the SEBI (LODR) Regulations, 2015, respectively. |



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|--|--|--|--|
| | | | <p>The Company has submitted reply / explanation and informed to BSE that the Company has complied with the Regulation 17(1), 18(1) and 19(1)/(2) of SEBI (LODR) Regulations, 2015 as such not liable to pay penalty / fine levied by BSE and requested to waive the fine levied on the Company and unfreeze the promoter(s) demat account(s).</p> <p>The Company has not received further communication from the BSE.</p> |
|--|--|--|--|

- (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) 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:

| Sr 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 | BSE Ltd. | Non Compliance with provision of Regulation 17(1), 18(1) and 19(1)/(2) of SEBI(LODR) Regulation 2015 | <ul style="list-style-type: none"> ➤ Below mentioned fined levied by BSE including 18% GST for the quarter ended December 2020 <ul style="list-style-type: none"> • Rs 401200 under Regulation 17(1). • Rs 160480 under Regulation 18(1). • Rs 160480 under Regulation 19(1)/(2). ➤ Demat account of Nimesh D Patel(Promoter/ Director) has been frozen in accordance with SEBI circular | During the year under review, as per the records of the Company, (i) the Board was comprised with optimum combination of Executive and Non-Executive Directors with woman Director and half of the Board was comprised of Independent Directors as per Regulation 17(1) of the SEBI (LODR) Regulations, 2015. (ii) The Audit Committee and Nomination and Remuneration Committee were constituted as |



| | | | | |
|--|--|--|---|--|
| | | | SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020. | <p>per Regulation 18(1) and 19(1)/(2) of the SEBI (LODR) Regulations, 2015, respectively.</p> <p>The Company has submitted reply/explanation and informed to BSE that the Company has complied with the Regulation 17(1), 18(1) and 19(1)/(2) of SEBI (LODR) Regulations, 2015 as such not liable to pay penalty / fine levied by BSE and requested to waive the fine levied on the Company and unfreeze the promoter(s) demat account(s).</p> <p>The Company has not received further communication from the BSE.</p> |
|--|--|--|---|--|

(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 ended | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------------|--|---|--|--|
| -----NIL----- | | | | |

FOR BHARAT PRAJAPATI & CO.
COMPANY SECRETARIES

Bharat Prajapati
Proprietor
F.C.S. No. : 9416
C.P. No. : 10788
UDIN: F009416C000528726



Place: Ahmedabad
Date: 28th June, 2021