

# ADITRI GEMS & JEWELS INDUSTRIES LIMITED

(Formerly known as Aditri Industries Limited)

Date: 30.05.2022

<b>To</b> <b>The Manager-Listing</b> <b>BSE Limited</b> <b>Phiroze Jeejeebhoy Towers</b> <b>Dalal Street, Kala Godha, Fort,</b> <b>Mumbai- 400 001</b> <b>Script Code: 534707</b>	<b>To</b> <b>Assistant Vice-President- Listing</b> <b>Metropolitan Stock Exchange of India Limited</b> <b>Vibgyor Towers, 4th Floor, Plot No. C 62, G-Block</b> <b>Opp. Trident Hotel, Bandra Kurla Complex</b> <b>Bandra (E), Mumbai- 400098</b> <b>Script Code: ADITRI</b>
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**SUB: Annual Secretarial Compliance Report for the year ended March 31, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")**

Dear Concern

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2022.

You are requested to take the same on record

**FOR ADITRI GEMS & JEWELS INDUSTRIES LIMITED**

**BHUSHAN PRAKASH MITTAL**  
**MANAGING DIRECTOR**  
**DIN: 09527307**



**ANKUR SINGH & ASSOCIATES**

**Company Secretaries**

**123-A, A-5 Block, Near Indraprastha School,**

**Paschim Vihar, New Delhi-110063.**

**PH. No -9711936784, Email Id - pcsankursingh@gmail.com**

**ANNUAL SECRETARIAL COMPLIANCE REPORT**

**(Under Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements)  
Regulations, 2015**

To,

**ADITRI GEMS & JEWELS INDUSTRIES LIMITED**

**(FORMERLY KNOWN AS ADITRI INDUSTRIES LIMITED)**

G.F-012- Satyam Mall, Opp. Saman Complex,

Near Vishweshwar Mahadev Mandir,

Satellite Ahmedabad, Gujarat -380015

**We, Ankur Singh & Associates, have examined**

All the documents and records made available to me and explanation provided by **ADITRI GEMS & JEWELS INDUSTRIES LIMITED** ("the listed entity"),

- a) the filings/ submissions made by the listed entity to the stock exchanges,
- b) website of the listed entity,
- c) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31 March 2022 ("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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Not Applicable to the Company during the Audit Period**);



- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;- *I have relied upon the explanations and/or clarifications provided by the company and accordingly it is to state that the said Regulations is not applicable during the period under review.*
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *I have relied upon the explanations and/or clarifications provided by the company and accordingly it is to state that the said Regulations is not applicable during the period under review.*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *I have relied upon the explanations and/or clarifications provided by the company and accordingly it is to state that the said Regulations is not applicable during the period under review.*
- g) Securities and Exchange Board of India (issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *I have relied upon the explanations and/or clarifications provided by the company and accordingly it is to state that the said Regulations is not applicable during the period under review.*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (herein after as "Insider Trading Regulation");
- i) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *I have relied upon the explanations and/or clarifications provided by the company and accordingly it is to state that the said Regulations is not applicable during the period under review.*
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
- k) The Depositories Act 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable;

The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client Circulars/ guidelines issued thereunder and based on the above examination, we hereby report that, during the Review Period:

- a) *The listed entity only filed/submitted disclosures/information with the stock exchanges as required under the securities laws for the quarter ended March 31, 2021 except following:*





*The listed has not filed disclosure under Regulation 30(1) and 30(2) - SEBI Takeover Regulations 2011;*

- b) *The listed entity is non-compliant with the provision of securities laws for/during the quarter ended June 30, 2021, September 30, 2021, December 31, 2021 and March 31, 2022.*
- c) *It has also been observed that the company did not pay the Annual Listing fee for the FY 2021-2022.*
- d) This listed entity has not maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder;
- e) No detail of information regarding the 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 been provided to us.
- f) The listed entity has taken the following actions with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous report	Observations made in the Secretarial Compliance Report for the year ended 31.03.2021 (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.
01	Regulation 47 SEBI (LODR), 2015: -  <b>Advertisement in Newspapers.</b>	Company did not submit the Newspaper Publication to the stock Exchange according to regulation 47 (2) of SEBI (LODR), 2015	The Listed entity has made checklist to comply the provisions.	The listed is expected to comply the provision.

FOR ANKUR SINGH & ASSOCIATES



(ANKUR SINGH)  
Proprietor  
Membership No: - A60761  
COP No: -22820

Place: - New Delhi

Date: -11.07.2022

UDIN: - A060761D000601400