



Maxheights Infrastructure Limited

Regd. Office : SD-65, Tower Apartment, Pitam Pura, New Delhi-110034
Ph. : 011 - 27314646, 27312522

Date: 27th May, 2024

**To,
The General Manager,
Department of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street , Fort
Mumbai- 400001**

**To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range
Kolkata - 700001**

SUBJECT: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2024

REF: MAXHEIGHTS INFRASTRUCTURE LIMITED (SCRIP CODE: 534338)

Dear Sir/Ma'am,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No: CIR/CFD/CMD1/27/2019 dated 8th February, 2019; please find enclosed the Annual Secretarial Compliance Report issued by Ms. Anuradha Malik (M.No: 60626 and CoP: 27205) Practicing Company Secretary for the financial year ended on 31st March, 2024

Kindly take the above information in your records.

**Thanking You
Yours Sincerely
For Max Heights Infrastructure Limited**

**Sonali Mathur
Company Secretary and Compliance Officer
M. No: A62205**

Place: Delhi



Anuradha Malik
Practicing Company Secretary

(Peer Reviewed)

Address: H.No. 61, VPO Jauli, Sonipat, Haryana-131301
M. No: +91 9034571110, Email: csanuradhamalik@gmail.com

Annual Secretarial Compliance Report
(Issued pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019)

For Max Heights Infrastructure Limited for the year ended 31st March, 2024

I, Anuradha Malik have examined:

- (a) all the documents and records made available to us and explanation provided by Max Heights 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 31st March, 2024 (“Review Period”) in respect of compliance with the provisions of:
 - (i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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; **Applicable**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Applicable**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**
- (e) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and Securities and Exchange Board of India (Share based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Applicable**
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulation(s), 1996 and 2018 and circulars/ guidelines issued thereunder; **Applicable**

ANURADHA
MALIK

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serialNumber=1968702064785217172208643, cn=ANURADHA MALIK
Date: 2024.05.27 14:51:18 +05'30'

	board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	Not Any
3	<u>Maintenance and disclosures on Website:</u> • The Listed entity is maintaining a functional website	Yes	Not Any
	• Timely dissemination of the documents/ information under a separate section on the website	Yes	Not Any
	• 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	Yes	Not Any
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	Not Any
5	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	(a) Yes (b) Yes	Not Any
6	<u>Preservation of Documents:</u> 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.	Yes	Not Any
7	<u>Performance Evaluation</u> The Listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	<u>Not Any</u>
8	<u>Related Party Transactions:</u> (a) The Listed entity has obtained prior approval of Audit Committee for all Related Party Transactions (b) In case no prior approval obtained , the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee	Yes	Not Any
9	<u>Disclosure of events or information:</u> The Listed entity has provided all the required disclosure(s) under Regulation 30		

	with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Not Any
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Not Any
11	<u>Actions taken by SEBI or Stock Exchange(s) , if any:</u> No Actions taken against the listed entity / its promoters / Directors/subsidiaries either by SEBI or Stock Exchanges (including under the Standard operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder.	Yes	As stated above the Company had received the payment for SOP fines, for the non compliance of Reg 24A(2) and Reg 6 of LODR, which were beyond the control of the Company and its management . The SOP fines were duly paid by the Company
12	<u>Additional Non-compliances, if any:</u> No any additional Non-compliance observed for all SEBI Regulations/Circular/ guidance note, etc.	None	

Anuradha Malik
Practicing Company Secretary

ANURADHA
MALIK

Digitally signed by ANURADHA MALIK
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serialNumber=1a39e0dec50d0256c1b183a5d84e789532aa
8096ec702f0ef7ab83177a2dbw43, cn=ANURADHA MALIK
Date: 2024.05.27 14:52:58 +05'30'

Mem. No.: 60626
COP: 27205

Dated: 27th May, 2024
Place: Sonipat

UDIN: A060626F000453656