

306, 3rd Floor, May Fair Gardens,
Road No.12, Banjara Hills, Hyderabad-500034,
Telangana, INDIA. (P): +91-40-6888285,
Email: info@gradienteinfotainment.net,
gradienteinfold@gmail.com
Url: www.gradienteinfotainment.in



To,

Date:30.06.2021

BSE Limited P. J. Towers, Dalal Street Mumbai-400001	Calcutta Stock Exchange Ltd., 7, Lyons Range, Dalhousie, Kolkata-700001, West Bengal
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Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015("Listing Regulations")

Unit: Gradiente Infotainment Limited

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, 2021.

This is for your information and records.

Thanking you.

Yours Faithfully,

For Gradiente Infotainment Limited

A blue ink handwritten signature, appearing to read "Vimal Raj Mathur", is written over the typed name and extends across the page.



Vimal Raj Mathur
Managing Director
(DIN: 03138072)

Enclosed: Compliance report issued by the Practicing Company Secretary



POOJA BANSAL
Practicing Company Secretary
Membership No. 50458
COP No. 18524

Flat No. F1, 5th floor, Respect Home,
Andul Road, Halderpara, Podrah,
Howrah - 711109
Email Id- pujab35@gmail.com
Contact No. 9038589527

**SECRETARIAL COMPLIANCE REPORT OF GRADIEN TE INFOTAINMENT LIMITED
FOR THE YEAR ENDED MARCH 31, 2021
(Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019)**

To,
GRADIEN TE INFOTAINMENT LIMITED
CIN: L74300TG1992PLC014317
#306, 3RD FLOOR, MAY FAIR GARDENS BANJARA HILLS,
ROAD NO 12 HYDERABAD - 500034

I, Pooja Bansal, Practicing Company Secretaries, have conducted the Secretarial Compliance Audit for the financial year ended March 31, 2021, of the applicable Securities and Exchange Board of India (the "SEBI") Regulations and the circulars/guidelines issued thereunder, for M/s. GRADIEN TE INFOTAINMENT LIMITED (the "Listed Entity"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

- (a) all the documents and records made available to us and explanation provided by 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 March 31, 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;

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 during the Review Period**;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy back of Securities)Regulations, 2018 - **Not applicable during the Review Period**;

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable during the Review Period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable 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 during the Review Period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- (i) Other applicable regulations and circulars/guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

The Listed Entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, **except** in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
None			

- (a) 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.
- (b) 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.
None				

- (c) The Listed Entity was not required to take any action with regard to compliance with the observations made in previous report as there was no observation in the previous report.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

**POOJA
BANSAL**

Digitally signed by POOJA
BANSAL
DN: c=IN, o=Personal,
postalCode=711109, st=WEST
BENGAL,
serialNumber=38ab8b5fd6b09e
8b37587503287a91a05684ab56a
42557fdbbcf2c1e0e7bfff20,
cn=POOJA BANSAL
Date: 2021.06.30 11:19:13 +05'30'

POOJA BANSAL
Practicing Company Secretary
Membership No.: 50458
COP: 18524

UDIN: A050458C000546261

Kolkata, June 30, 2021