



Srishti Singh
ACS, LL.B.

Srishti Singh & Associates
Company Secretary
A-17/G-2, A-Block,
Dilshad Garden, New Delhi- 110095
Mob. 8858060821
Email Id: cssrishtisingh@gmail.com

Annual Secretarial Compliance Report of JYOTIRGAMYA ENTERPRISES LIMITED
for the year ended 31st March, 2021

We, M/s Srishti Singh & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by **Jyotirgamy Enterprises 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, 2021 ("Review Period")** in respect of compliance with the provisions of :

- (1) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- (2) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- (i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during period under review)**
- (v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during period under review)**
- (vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during period under review)**
- (vii) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during period under review)**
- (viii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (ix) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 as applicable;
- (x) Other applicable circulars/ guidelines issued there under;

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

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under; except in respect of matters specified below:-

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 13(3) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Late submission of Statement of Investor Complaints for the quarter ended June 2020 	<ul style="list-style-type: none"> The Listed Entity has submitted the Statement of Investor Complaints for the quarter ended 30th June, 2020 on 22nd July, 2020 which was required to be filed by 21st July, 2020. The delay was on account of pandemic situation in the Country and consequent lockdown. The Company had already applied for the waiver of the penalty imposed by the Board for the delay of one day.
2.	Regulation 31 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Late submission of Statement of Shareholding Pattern for the quarter ended March 2020 and June 2020 	<ul style="list-style-type: none"> The Listed Entity has submitted its Statement of Shareholding Pattern for the quarter ended 31st Mar, 2020 on 16th May, 2020 which was required to be filed by 15th May, 2020 (In line with Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/79 dated 12th May, 2020 issued by SEBI). The delay was on account of pandemic situation in the Country and consequent lockdown. The Listed Entity has submitted its Statement of Shareholding Pattern for the quarter ended 30th June, 2020 on 22nd July, 2020 which was required to be filed by 21st July, 2020. The Company had already applied for the waiver of the penalty imposed by the Board for the delay of one day.
3.	Regulation 33 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Irregularity in submission of Financial Results for the quarter ended March 2020 and December 2020 	<ul style="list-style-type: none"> The Company uploaded the financial results on 31st July, 2020 unaccompanied with Audit Report for the quarter ended March, 2020. The same was made good by the Company on 1st August, 2020 by uploading the Financial Results complete with Audit Report.
4.	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	<ul style="list-style-type: none"> Late submission of Reconciliation of Share Capital Audit Report for the quarter ended June 2020 and September 2020 	<ul style="list-style-type: none"> The Listed Entity has submitted its Reconciliation of Share Capital Audit Report for the quarter ended March, 2020 on 18th August, 2020 which was required to be filed by 30th July, 2020. The delay was on account of pandemic situation in the Country and consequent lockdown. There was certain irregularity / discrepancy in filing of Reconciliation of Share Capital Audit Report under Regulation 76 for the quarter ended 30th September, 2020 on 30th October, 2020, which was made good by the Company by filing the revised Report on 3rd November, 2020.
5.	Regulation 7(3) of SEBI (Listing Obligations And Disclosure	<ul style="list-style-type: none"> Irregularity in submission of Compliance 	<ul style="list-style-type: none"> There was certain irregularity / discrepancy in filing of Compliance Certificate under Regulation 7(3) of the SEBI (Listing

	Requirements) Regulations, 2015	Certificate under Regulation 7(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended 30th September, 2020	Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended 30th September, 2020, which was made good by the Company by filing the revised Certificate on 3rd November, 2020.
6.	Regulation 40 (9) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Late submission of Certificate under Regulation 40 (9) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 	<ul style="list-style-type: none"> The Listed Entity has submitted its Reconciliation of Share Capital Audit Report for the quarter ended March, 2020 on 18th August, 2020 which was required to be filed by 31st May, 2020. The delay was on account of non release of date from Depository in spite payment of all the dues as their offices were closed on account of lockdown.
7.	Regulation 46 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Improper maintenance of functional website 	<ul style="list-style-type: none"> The listed entity is not maintaining website as per Regulation 46 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015. The Company is in the process of updating its website.
8.	Regulation 6 (1) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Listed Entity has not appointed a Company Secretary as the compliance officer. 	<ul style="list-style-type: none"> The earlier incumbent has resigned from the post of Compliance Officer on 14/08/2019. The Company made good the loss by appointing the Company Secretary & Compliance Office on 24th August, 2020.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our 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 there under:

S. 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.	Bombay Stock Exchange Limited.	Late submission of Statement of Investor Complaint and Shareholding Pattern under Regulation 13(3) and 31 respectively for the quarter ended 30 th , June 2020 and non appointment of Company Secretary & Compliance Officer under Regulation 6 (1).	Fine of Rs. 1,07,380/- levied for violating the provisions of Regulation 6 (1) and Fine of Rs. Rs. 4,720/- levied for violating the provisions of Regulation 13(3) and 31.	The Listed entity had already applied for and got the partial waiver of penalty from BSE Ltd. The Company has applied for complete waiver.

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 st , March, 2020. (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
1.	Regulation 29(1)(a) & 29(2) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	Delay in giving prior intimation to Exchange about the Meeting of the Board of Directors for consideration of Quarterly Financial Results for the period ended 30 th , September, 2019.	The Listed entity had applied for the waiver of such fines imposed on it and making payment of rest of the amount. The Company had ensured the compliance of the same in future	The Listed entity had applied for the waiver and it will make good the default and ensure the compliance in future.
2.	Regulation 33 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	<ul style="list-style-type: none"> Late submission of Financial Results for the quarter ended 31st, March, 2019 and 30th September, 2019. Financial Results for the quarter ended 31st December, 2019 filed on 14th, February, 2020 without Limited Review Report (LRR) from Auditor. 	The Listed entity had applied for the waiver of such fines imposed on it and making payment of rest of the amount. The Company had ensured the compliance of the same in future	The Listed entity had applied for the waiver and it will make good the default and ensure the compliance in future.
3.	Regulation 33 of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	Financial Results shall be published in Newspaper within 48 hours of conclusion of Board Meeting.	The Company had ensured the compliance of the same in future	The Company had ensured the compliance of the same in future
4.	Regulation 6 (1) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	Listed Entity has not appointed a Company Secretary as the compliance officer.	The Listed entity had already applied for and got the partial waiver of penalty from BSE Ltd. The Company has applied for complete waiver.	The Company had got the partial waiver of Rs. 51,920/- and applied for complete waiver as well.

**For Srishti Singh & Associates
Practicing Company Secretaries**



Srishti Singh
(Proprietor)
Mem. No. A50820
COP No. 21900

Place: New Delhi
Date: 30.06.2021
UDIN: A050820C000557458