

Anant Raj Limited

CIN: L45400HR1985PLC021622

Head Off : H-65, Connaught Circus, New Delhi-110 001

Tel : 011-43034400, 23324127, 23323880 Fax : 011-43582879

Email : info@anantrajlimited.com Website : www.anantrajlimited.com

Regd. Office : CP-1, Sector-8, IMT Manesar, Haryana-122051

Telefax : (0124) 4265817



ARL/CS/13273

May 30, 2023

<p>The Secretary, National Stock Exchange of India Limited, "Exchange Plaza", 5th Floor, Plot No. C/1, G-Block, Bandra – Kurla Complex, Bandra (E), Mumbai-400051</p> <p>Scrip code: ANANTRAJ</p>	<p>The Manager Listing Department B S E Limited, Phiroze Jee Jee Bhoy Towers, Dalal Street, Mumbai – 400001</p> <p>Scrip code: 515055</p>
---	---

Sub: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

In reference to the compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Annual Secretarial Compliance Report issued by Ms. Priya Jindal, Practicing Company Secretary for the financial year ended March 31, 2023.

Kindly take the same on record.

Thanking You,
For **Anant Raj Limited**

Manoj Pahwa
Company Secretary
A7812

Encl: As above



PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

**Annual Secretarial Compliance Report
of
ANANT RAJ LIMITED
for the financial year ended March 31, 2023**

I, Priya Jindal, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **ANANT RAJ 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 March 31, 2023 ("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;
- (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; **Not applicable to the Company during the year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; – **Not applicable to the Company during the year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable to the Company during the year under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) 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 the compliance status of the listed entity is appended as below:





PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	None
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/information under a separate section on the websiteWeb-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	None
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	N/A Yes	The Company does not have any material Subsidiary as on March 31, 2023. However, the Company has placed a policy

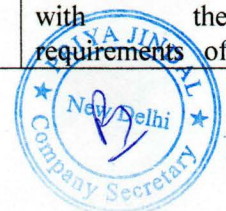




PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

			for determining material subsidiary.
6.	Preservation of Documents: 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	None
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	As per SEBI LODR and Companies Act, 2013, the Board Evaluation is required to be done once in a year. Formal process of Performance Evaluation was carried out in the month of May, 2022 for FY 22-23.
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	a) Yes b) N/A	Since, all Related party transactions were entered after obtaining prior approval of audit committee point (b) is not applicable
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	The Company is in compliance with the requirements of





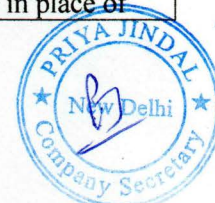
PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

			maintaining Structured Digital Database (SDD) as per the Regulations 3(5) and 3(6) of SEBI (PIT) Regulations, 2015.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ its promoters/ directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	Yes (subject to disclosures reported in this Report)	(refer Table (a) below)
12	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	None

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such</p>	N/A	<p>During the period under review, no resignation has taken place.</p> <p>However, the Company at its Annual General Meeting held on July 11, 2022 appointed M/s Ranjana Vandana & Co. as Statutory Auditors of the Company in place of</p>





PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

	resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.		M/s Vinod Kumar Bindal & Co., the retiring Statutory Auditors whose tenure expired at the Annual General Meeting held on July 11, 2022.
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the</p>	N/A	None





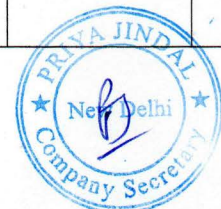
PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

	listed entity/ its material subsidiary has not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	N/A	None

(a) 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.	Com-pliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practising Company Secretary	Management Response	Remarks
1.	As per Regulation 29 of SEBI (LODR) Regulations 2015, the listed entity shall give prior intimation to the Stock exchange(s) about the meeting of the Board of Directors for the proposals mentioned in the said regulation.	Regulation 29 of SEBI (LODR) Regulations 2015,	Delay in furnishing prior intimation about the meeting of Board of Directors held on August 03, 2022 for fund raising	NSE	Fine	The prior intimation of Board meeting to be held on August 3, 2022 for considering the financial results for the quarter ended June 30, 2022, was submitted to Stock Exchanges on July 27, 2022. The	Rs. 10,000/-	The Company is non-compliant /Late Compliant with the regulation 29(2)/(3) of SEBI (LODR) Regulations, 2015	The board members took note of the impositions of the penalty by the NSE and made emphasis as to strengthening the governance procedures so as to ensure compliance at all times.	-





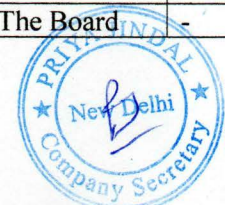
PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

						<p>decision to raise the funds was taken at the aforesaid Board Meeting only. Therefore, the giving of advance notice of fund raising as specified in the Regulation 29 of SEBI (Listing Obligations and Disclosures requirements) Regulations, 2015 was not possible.</p>				
--	--	--	--	--	--	--	--	--	--	--

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

Sr. No.	Compliance Requirement (Regulations/circulars/guide-lines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	As per	Regula	Delay	NSE	Fine	Non-	Rs.	The	The Board	-





PRIYA JINDAL

703, Signa, Omaxe Spa Village,
Sector-78, Faridabad-121010

Regulation 29 of SEBI (LODR) Regulations 2015, the listed entity shall give prior intimation to the Stock exchange(s) about the meeting of the Board of Directors for the proposals mentioned in the said regulation.	tion 29 of SEBI (LODR) Regulations 2015,	in furnishing prior intimation about the meeting of Board of Directors held on December 25, 2021 for fund raising	& BSE		compliance of Regulation 29(2)/(3) of SEBI (LODR) Regulations, 2015	10,000 each	Company is Non-compliant /late Compliant with the Regulation 29(2)/(3) of SEBI (LODR) Regulations 2015. The Company has paid the fine/Penalty levied by the Stock Exchange (s).	noted that the delay was inadvertent and emphasized that going forward prescribed timelines should be strictly adhered to as far as practically possible.
--	--	---	-------	--	---	-------------	--	---

Place: New Delhi
Date: 29/05/2023
UDIN: F012506E000409386


Signature
Priya jindal
FCS No.: 12506
CP No.: 20065
PR No: 2356/2022