Neha Poddar
Company Secretary
129 Bangur Avenue
Block "A", Opposite Reliance Fresh
Kolkata – 700 055
Phone: + 91 99030 48692
csneha.poddar2710@gmail.com

To
Monitoring Committee
Jet Airways (India) Ltd
CIN:- L99999MH1992PLC066213
Global One, 3rd floor, 252, LBS Marg,
Kurla (West), Mumbai – 400070

Sub.: Annual Secretarial Compliance Report for the Financial Year 2020-21

Dear Sir,

I have been appointed to conduct an Audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019 and to issue the Annual Secretarial Compliance Report for M/s. Jet Airways (India) Limited (hereinafter referred to as the "Company") bearing CIN: L99999MH1992PLC066213 whose Shares are listed on BSE and NSE.

Company was facing financial distress and was unable to service its scheduled debt resultant the company was forced to suspend its operations on April 17, 2019 as a result, the directors, CEO, CFO, CS including other top management personal had resigned. In absence of the top management officials and requisite personnel, this report is based on the information gathered by the erstwhile Resolution Professional and the remaining employees of Asset Preservation Team. As per requirements of the 'Code' and 'CIRP Regulations', the erstwhile RP had invited expression of Interest (EoI) from prospective Resolution Applicants (PRAs) to submit the Resolution Plan for the Company. Final plans received was placed and put to vote in the 17th CoC meeting held on 03rd October 2020. The resolution plan submitted by the Jalan Fritsch Consortium was approved by CoC. The application for Plan approval was filed with Hon'ble National Company Law Tribunal (NCLT) dated 05th November 2020 and subsequently has been approved/allowed by the Hon'ble NCLT on 25th June 2021 via order dated 22nd June 2021, subject to certain directions which are to be issued by a separate order. As per the terms of the Resolution Plan approved/allowed by the Hon'ble NCLT on 25th June 2021 via order dated 22nd June 2021, Monitoring Committee was constituted on 28th June 2021.

My responsibility is to verify Compliance by the Company with the provisions of all applicable SEBI Regulations and Circulars/Guidelines issued from time to time and issue a Report thereon.

My Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications considered and necessaryand adequate for the said purpose. Annual Secretarial Compliance is attached herewith.

Neha Poddar



Neha Poddar
Practicing Company Secretary
Mem No:-A33026
Cp No:- 12190
Place:- Kolkata
Dated:- 30.06.2021

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Secretarial Compliance Report of Jet Airways (India) Limited (CIN: L99999MH1992PLC066213) for the year ended March 31, 2021

I have examined:

a) All the documents and records made available to me and explanations provided by the Company;
b) the filings/submissions made by the company to the Stock Exchanges;
c) Website of the Company;
d) Any other documents/filings, as may be relevant, which has been relied upon to prepare this Certificate.

For the financial year ended on March 31, 2021 in respect of Compliance with the provisions of:

1. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, Circular, Guidelines issued thereunder and;
2. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under and the Regulations, Circular, Guidelines issued thereunder by the Securities & Exchange Board of India (SEBI);

The specific Regulations whose provisions and the Circulars/Guidelines issued thereunder have been examined, includes -

(a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(c) *The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

(d) *The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 notified on 28 October 2014;

(e) *The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

(f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008.

(g) *The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

(h) *The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;

*Not applicable as no event took place under these Regulations during the financial year under review

NEHA PODDAR Kolkata-55 Company Secretary

and circulars/ guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:

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.	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary, if any
1.	Regulations 33(3)(a) Consolidated Financial Results along with the Auditors Report. - For all quarters	Not filed till the date of issue of report.	Not Filed.
2.	Regulation 23(9) Disclosure of RPT with half yearly Financials for the Half year ending September 2020	Not filed till the date of issue of report.	Pending under process.
3.	Regulations 33(3)(a) Standalone Financial Results along with the Auditors Report	Delay in submission	The financials were Submitted on 30.06.2021
4.	Regulation 34(1) & 36(2) Notice for the AGM of Financial Year Ending March,2020	Submitted on time	The Notice was submitted on time.
5.	Regulation 34(1) & 36(2) Annual Report for the AGM of Financial Year Ending March,2020	Delay in Submission	Annual Report submitted.
6.	Regulation 44 of SEBI (LODR) Regulation,2015 for voting results for Financial Year Ending March,2020	Delay in Submission	Voting results submitted
7	Regulation 31(1)(b) of the SEBI (LODR) Regulation,2015 of Shareholding Pattern for the for the Quarter.	Delay in Submission	Shareholding Pattern was submitted
8.	Regulation 27(2)(a) of the SEBI (LODR) Regulation,2015 of Corporate Governance for the quarter ending	Not filed till the date of issue of report.	Not filed

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9.	Regulation 14 of SEBI (LODR) Regulations, 2015 of Fee and other charges to be paid to the recognized Stock Exchange(s) for the Financial Year ended 2021	Delay in Submission	Delayed
10.	Regulation 6(1) of SEBI LODR Regulations, 2015- A listed entity shall appoint a qualified company secretary as the compliance officer.	NSE Listing fees paid; BSE listing fees disputed.	Under Process
11.	Regulation 7(3) of SEBI LODR Regulations, 2015- Thelisted entity shall submit a compliance certificate to the exchange, duly signed by boththe compliance officer of the listed entity and the authorized representative of the share transfer agent.	No CS as the Company was under CIRP and now under Revival.	The Company is under CIRP and now under revival.
12	Regulation 17 (1)(a) of SEBILODR Regulations, 2015 —The Board of directors of alisted entity shall have an optimum combination ofexecutive and non-executive directors with at least one woman director and not lessthan fifty percent of the boardof directors shall comprise ofnon-executive directors. Provided that the Board of	Not complied as the Board is not in place.	The Company is under CIRP and now under revival.

NEHA PODDAR Kolkata-055 Company Secretary

	directors of the top 500 listedentities shall have at least one Independent woman director by April1, 2019.		
13..	Regulation 17 (8) of SEBI LODR Regulations, 2015 - The Chief Executive Officer (CEO) and the Chief Financial Officer (CFO)shall provide the compliancecertificate to the board of directors as specified in Part B of Schedule II. Regulation 23(2) of SEBI LODR Regulations, 2015 - Allrelated party transactions shall require prior approval of theaudit committee.	Not complied as the Board is not in place.	The Company is under CIRP and now under revival.
14.	Regulation 27(2)(c) of SEBI LODR Regulations, 2015 -The report mentioned in clause (a) of sub-regulation (2)shall be signed either by the compliance officer or the chiefexecutive officer of the listed entity	No CEO and CFO	The Company is under CIRP and now under revival.
15.	Regulation 57(1) of SEBI LODR Regulations, 2015- The listed entity shall submit acertificate to the stock exchange within two days of the interest or principal or both becoming due that it has	The Company is under CIRP and now under revival.	The Company is under CIRP and now under revival.

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	made timely payment of interests or principal obligations or both in respect of the non convertible debt securities.	No CEO or CFO in the Company. Resigned before CIRP process	

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Company Secretary
Kolkata-55

b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.

c) The following are the details of actions taken against the Company, its Promoters, Directors, either by the 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 –No Action took place for the aforesaid period

d) The listed entity has taken the following actions to comply with the observations made in previous reports: The previous report is not submitted till date.

Neha Podda



Place: Kolkata
Dated:30.6.2021

NEHA PODDAR
(Practicing Company Secretary)
ACS – 33026 / CP – 12190
UDIN NO:A033026C000561708