

Dated: May 29, 2024

To
Listing Operations,
BSE Limited,
P J Towers, Dalal Street,
Mumbai - 400001.

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the FY 2023-24

In pursuance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements Regulations) 2015, please find attached herewith Annual Secretarial Compliance Report for the Financial year 2023-24.

For Jana Holdings Limited

Vidya Sridharan
Company Secretary and
Compliance Officer (Mem. No. 44354)



Nagendra D. Rao, B.Com., LL.B., F.C.S.
Practising Company Secretary

Secretarial Compliance Report of Jana Holdings Limited having Corporate Identification Number U74900KA2016PLC086838 ('the listed entity') for the financial year ended 31st March, 2024.

I have examined:

- (a) all the documents and records made available to us and explanation provided by Jana Holdings 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:

- (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; **[To the extent Applicable to Non-Convertible Debentures/ 'high value debt listed entity' only];**
- (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; **[Not Applicable]**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **[Not Applicable];**



(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 [**Not Applicable**];

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

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

and circulars and guidelines issued thereunder

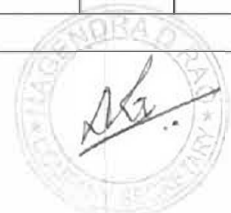
and based on the above examination, I hereby report that, during the Review period:

(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)	Regulation/ Circular No.	Deviations	Action Taken by the listed entity, if any	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As detailed under Annexure - I										

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

Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As detailed under Annexure - II										



I. I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

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).	Yes	-
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 entities 	Yes	<p>The Company has not adopted policy for determining 'Material' subsidiary, presently the same is on comply and explain basis until March 31, 2024, in terms of the regulation 15 of the SEBI (LODR) Regulations, 2015.</p> <p>Except to the above the Company have all other policies in place as applicable to the Listed Entity.</p> <p>Accordingly, the Company needs to explain the above in the quarterly compliance report on Corporate Governance.</p>
	<ul style="list-style-type: none"> All 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	-



3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/ information under a separate section on the website 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 Yes Yes	- - -
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	-
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	NA	The company does not have any subsidiaries.
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	-
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	-
8	Related Party Transactions:		



	<p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(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.</p>	<p>Yes</p> <p>NA</p>	<p>-</p> <p>The listed entity has obtained prior approval of Audit Committee for all Related Party transactions.</p>
9	<p>Disclosure of events or information:</p> <p>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</p>	N.A.	<p>The company being a High Value Debt Listed Company, Regulation 30 is not applicable to the company.</p> <p>However, Part B of Schedule III is applicable to the company.</p> <p>The company has not filed Outcome of the Board meetings dated April 19, 2023, May 20, 2023, November 30, 2023 and March 15, 2024 within 30 minutes of the closure of the Board meetings with BSE, as required under Schedule III Part B of the SEBI (LODR) Regulations, 2015 read with Regulation 51(2).</p> <p>In pursuance to Schedule III Part B of the SEBI (LODR) Regulations, 2015 read with Regulation 51(2) - the Company has not intimated the Stock Exchange pertaining to Cancellation of Non-Convertible securities in whole or part.</p> <p>During the quarter ended March 31, 2023 and quarter ended December 31, 2023</p>



			<p>there was breach and changes in covenants under the terms of non-convertible debentures. The Company has not intimated the Stock Exchange under the Regulation 51(2) of SEBI (LODR) Regulations, 2015.</p> <p>There has been delay of 6 days in Listing of 24,300 Debentures Private Placed Securities bearing ISIN INE682V08158, issued in favour of TPG Asia VI India Markets PTE Ltd, beyond the timeline specified in Chapter VII of SEBI Circular no. SEBI/HO/DDHS/P/CIR/2021/613 dated August 10, 2021.</p>
10	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	-
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been 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 except as provided under separate paragraph herein (**).</p>	Yes	-



12	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	N.A.	The Auditors of the company have not resigned during the period under review
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	-

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



Nagendra D. Rao
Practising Company Secretary
Membership No. FCS – 5553
Certificate of Practice – 7731
Peer Reviewed Unit

Peer Review Certificate No.: 672/2020
UDIN: F005553F000388221

Place: Bengaluru
Date: May 17, 2024

Annexure - I

(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)	Regulation/ Circular No.	Deviations	Action Taken by the listed entity, if any	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity shall give prior intimation to the stock exchange of at least two working days in advance, excluding the date of the intimation and the date of the meeting of the board of directors, about the Board meeting in which any of the following proposals is to be considered: (c) financial results viz. quarterly or annual, as the case may be	Regulation 50(1) (d) of SEBI (LODR) Regulations, 2015	The Company has not intimated about Board Meeting (For Quarter ended 31 December, 2023) as required under Regulation 50(1) of the SEBI (LODR) Regulations, 2015.	The company has paid the fine of Rs. 5,900/- levied on the company on 05 th February, 2024.	BSE Limited had levied a fine of Rs. 5,900/- on the company due to the delayed compliance made by the company vide their email dated 30 th January, 2024.	Non-Submission of intimation about Board Meeting (For Quarter ended 31 December, 2023) as required under Regulation 50(1) of the SEBI (LODR) Regulations, 2015.	Rs. 5,900/-	The company has paid the fine of Rs. 5,900/- levied on the Company on 05 th February, 2024.	The Company has not made intimation to the BSE for Board Meeting held on 30 th November, 2023 as required under Regulation 50 (1) (d) of SEBI (LODR) Regulations, 2015. In view of the same the Company has paid the fine of Rs. 5,900/- levied on the Company on 05 th February, 2024	The Fine has been paid.
2.	The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or require specifying the purpose of the record date.	Regulation 60(2) of SEBI (LODR) Regulations, 2015	Delay in submission of the notice of Record Date for the month ended 30 th November, 2023.	The company has paid the fine of Rs. 11,800/- levied on the company on 03 rd January, 2024.	BSE Limited had levied a fine of Rs. 11,800/- on the company vide their email dated 01 st January, 2024.	Delay in submission of the notice of Record Date.	Rs. 11,800/-	The company has paid the fine of Rs. 11,800/- levied on the company on 03 rd January, 2024.	The company has paid the fine of Rs. 11,800/- levied on the company on 03 rd January, 2024 for the month ended 30 th November, 2023.	The Fine has been paid.



3.	The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognized stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or require specifying the purpose of the record date.	Regulation 60(2) of SEBI (LODR) Regulations, 2015	Delay in submission of the notice of Record Date for the month ended 31 st January, 2024.	The company has paid the fine of Rs. 23,600/- levied on the company on 20 th March, 2024.	BSE Limited had levied a fine of Rs. 23,600/- on the company vide their email dated 18 th March, 2024.	Delay in submission of the notice of Record Date	Rs. 23,600/-	The company has paid the fine of Rs. 23,600/- levied on the company on 20 th March, 2024.	The company has paid the fine of Rs. 23,600/- levied on the company on 20 th March, 2024 for the month ended 31 st January, 2024.	The Fine has been paid.
4.	The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or require specifying the purpose of the record date.	Regulation 60(2) of SEBI (LODR) Regulations, 2015	Delay in submission of the notice of Record Date for the month ended 31 st December, 2023	The company has paid the fine of Rs. 11,800/- levied on the company on 05 th February, 2024.	BSE Limited had levied a fine of Rs. 11,800/- on the company vide their email dated 30 th January, 2024.	Delay in submission of the notice of Record Date	Rs. 11,800/-	The company has paid the fine of Rs. 11,800/- levied on the company on 05 th February, 2024.	The company has paid the fine of Rs. 11,800/- levied on the company on 05 th February, 2024 for the month ended 31 st December, 2023	The Fine has been paid.
5.	The listed entity shall give prior intimation to the stock exchange of at least two working days in advance, excluding the date of the intimation and the date of the meeting of the board of directors, about the Board meeting in which any of the following	Regulation 50(1) of SEBI (LODR) Regulations, 2015	The company could not provide for adequate notice to the BSE for holding Board meetings on May 05, 2023, May	-	-	The company could not provide for adequate notice to the BSE for holding Board meetings on May 05, 2023, May	-	The company could not provide for adequate notice to the BSE for holding Board meetings on May 05, 2023, May 18, 2023, and December 12,	-	-



	<p>proposals is to be considered –</p> <p>(a) an alteration in the form or nature of non-convertible securities that are listed on the stock exchange or in the rights or privileges of the holders thereof;</p> <p>(b) an alteration in the date of the interest/ dividend/ redemption payment of non-convertible securities;</p> <p>(c) financial results viz. quarterly or annual, as the case may be;</p> <p>(d) fund raising by way of issuance of non-convertible securities; or</p> <p>(e) any matter affecting the rights or interests of holders of non-convertible securities.</p>		<p>18, 2023, and December 12, 2023 (rescheduled to December 18, 2023, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>			<p>18, 2023, and December 12, 2023 (rescheduled to December 18, 2023, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>		<p>2023 (rescheduled to December 18, 2023, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>		
6.	<p>The board of directors shall have an optimum combination of executive and non-executive directors with at least one-woman director and not less than fifty per cent. of the board of directors shall comprise of non-executive directors.</p>	<p>Regulation 17 (1) of SEBI (LODR) Regulations, 2015</p>	<p>Non-appointment of women Director after cessation of Mrs. Saraswathy Athmanathan, who resigned with effect from 19th July, 2023.</p>	-	-	<p>Non-appointment of women director from 20th July, 2023 till March 24, 2024 as required under Regulation 17(1) of SEBI (LODR) Regulations, 2015</p>	-	<p>As per Regulation 15 of SEBI (LODR) Regulations, 2015, Regulation 16 to Regulation 27 have been made applicable to the company on a 'comply or explain' basis until March 31, 2024. Accordingly,</p>	<p>The Company being high value debt listed Company is required to appoint Women Independent Director by 18th October, 2023 as per SEBI (LODR) Regulations, 2015.</p> <p>The same is on comply and explain basis upto 31st March, 2024.</p> <p>Hence the company will explain the reasons for the with regards to non-appointment of women Director during the</p>	<p>The Company has taken the note of the same in their Board Minutes dated October 25, 2023. The Company needs to explain the same, in the quarterly</p>



								the company needs to explain the reasons with regards to non-appointment of Women Director in place of Mrs. Saraswathy Athmanathan who resigned from the Board of the Company with effect from July 19th, 2023.	quarter ended 31 st July 2023 to March 24, 2024.	compliance report on Corporate Governance.
7.	The Chairperson of the nomination and remuneration committee may be present at the annual general meeting, to answer the shareholders' queries; however, it shall be up to the chairperson to decide who shall answer the queries.	Regulation 19 (3) of SEBI (LODR) Regulations, 2015	Chairperson of Nomination and Remuneration Committee was not present at the annual general meeting held on 13th July, 2023.	-	-	The chairperson of Nomination and remuneration committee was not present at the annual general meeting held on 13th July, 2023.	-	As per Regulation 15 of SEBI (LODR) Regulations, 2015, Regulation 16 to Regulation 27 have been made applicable to the company on a 'comply or explain' basis until March 31, 2024. Accordingly, the Company needs to explain the reasons for absence of Mrs. Saraswathy Athmanathan chairperson of Nomination	As per the regulation 15 of the SEBI (LODR) Regulations, 2015, Regulation 16 to Regulation 27 have been made applicable to the company on a 'comply or explain' basis until March 31, 2024. Hence the company will explain the reasons for absence of Mrs. Saraswathy Athmanathan chairperson of Nomination and Remuneration Committee in Annual General Meeting held on 13 th July, 2023.	The Company has explained in the Half yearly Corporate Governance Report for the half year ended 30 th September, 2023.



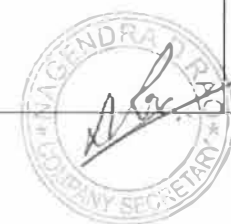
								and Remuneration Committee in Annual General Meeting.		
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Annexure - II

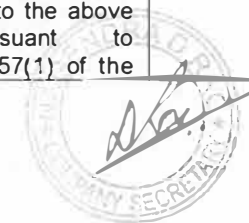
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
For the Financial year 2022-23:										
1.	The listed entity shall give prior intimation to the stock exchange of at least two working days in advance, excluding the date of the intimation and the date of the meeting of the board of directors, about the Board meeting in which any of the following proposals is to be considered:	Regulation 50(1)(c) of SEBI (LODR) Regulations, 2015	Delay in furnishing intimation about Board Meeting (For Quarter ended 30 September, 2022) as required under Regulation 50(1) of the SEBI (LODR) Regulations, 2015.	The company had filed a waiver application dated December 22, 2022 before BSE Limited for waiving the Fine levied on the company.	BSE Limited had levied a fine of Rs. 5,900/- on the company due to the delayed compliance made by the company vide their email dated 14 th December, 2022. Further, BSE has waived the fine payable vide their email dated 20 th February, 2023.	Delay in furnishing intimation about Board Meeting (For Quarter ended 30 September, 2022) as required under Regulation 50(1) of the SEBI (LODR) Regulations, 2015.	Rs. 5,900/-	The company had filed a waiver application dated December 22, 2022 for waiving the Fine levied of Rs. 5,900/-, before BSE Limited and BSE has waived the fine payable vide their email dated 20 th February, 2023.	The Company had made the intimation to the BSE on November 03, 2022, that the Board meeting will be held on November 11, 2022, to consider and approve the Unaudited financial results along with limited review report for the quarter ended September 30, 2022. Further due to unforeseen circumstances the company was required to reschedule the meeting to November 14, 2022, and the Company has duly intimated on November 10, 2022,	BSE has waived the fine levied on the company vide its email dated 20 th February, 2023.

	(c) financial results viz. quarterly or annual, as the case may be								about the change of the Board meeting to November 14, 2022. Thereby, the second intimation is only in continuation of the initial intimation to the BSE made on November 03, 2022. Since, the Company has made sufficient intimation for the Board meeting and the rescheduled meeting date to the BSE the company has not violated the regulation 50(1) of SEBI (LODR) Regulations, 2015.	
2.	The listed entity shall submit to the stock exchange and the debenture trustee and publish on its website- (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting, not later than the date of commencement of dispatch to its shareholders; and (b) in the event of any changes to the annual report, the revised copy along with the details and explanation for	Regulation 53(2) of SEBI (LODR) Regulations, 2015	Non-submission of annual report within the period prescribed under this regulation for Financial Year 2022-23.	The company has paid the fine of Rs. 49,560/- levied on the company on 04 th November, 2022.	BSE Limited had levied a fine of Rs. 49,560/- on the company due to the delayed compliance made by the company vide their email dated 31 October 2022.	Non-submission of annual report within the period prescribed under Regulation 53(2) of SEBI (LODR) Regulations, 2015.	Rs. 49,560/-	The company has paid the fine of Rs. 49,560/- levied on the company on 04 th November, 2022.	The company has paid the fine of Rs. 49,560/- levied on the company on 04 th November, 2022.	The Company has paid the fine.



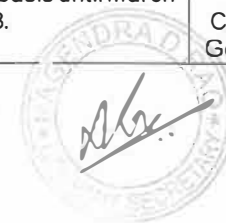
	the changes, not later than 48 hours after the annual general meeting.]									
3.	The listed entity shall disclose to the stock exchange in quarterly, half-yearly, year-to-date and annual financial statements, as applicable, the extent and nature of security created and maintained with respect to its secured listed non-convertible debt securities	Regulation 54(2) of SEBI (LODR) Regulations, 2015	Non-disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the financial statements for Quarter ended 30 th June, 2022.	The company has paid a fine of Rs. 34,220/- on 15th September, 2022 towards Non-disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the financial statements under Regulation 54(2). Further, the company has paid the balance amount of fine of Rs. 1,81,720 on 15th February, 2023.	BSE Limited had levied a fine of Rs. 2,15,940/- on the company vide their email dated 14 September, 2022 and 15 February, 2023.	Non-disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the financial statements for Quarter ended 30 th June, 2022.	Rs. 2,15,940/-	The company has paid a fine of Rs. 34,220/- on 15th September, 2022 Further, the company has paid the balance amount of fine of Rs. 1,81,720 on 15th February, 2023.	The company has paid a fine of Rs. 34,220/- on 15th September, 2022 Further, the company has paid the balance amount of fine of Rs. 1,81,720 on 15th February, 2023.	The Company has paid the fine.
4.	The listed entity shall submit a certificate to the stock exchange within one working day of the interest or dividend or principal becoming due regarding status of payment in case of non-convertible securities	Regulation 57(1) of SEBI (LODR) Regulations, 2015	Non-disclosure of information related to payment obligations in relation to the below mentioned ISINs – INE682V07028, INE682V07028, INE682V07010, INE682V07069,	The company had filed a waiver application dated September 28, 2022 before BSE Limited for waiving the Fine levied on the company.	BSE Limited had levied a fine of Rs. 29,98,380/- on the company vide their email dated 28 September, 2022, due to Non-disclosure of information related to payment obligations under Regulation 57(1) of SEBI (LODR) Regulations, 2015. Further, BSE has waived the fine payable vide their email dated 17 th February, 2023.	Non-disclosure of information related to payment obligations under Regulation 57(1) of SEBI (LODR) Regulations, 2015.	Rs. 29,98,380/-	The company had filed a waiver application dated September 28, 2022 for waiving the Fine levied of Rs. 29,98,380/- before BSE Limited and BSE has waived the fine payable vide their email dated	The Face value of the ISINs (INE682V07010, INE682V07028, INE682V07036, INE682V07044, INE682V07051, INE682V07069 and INE682V07077) are Rs. 10,00,000 per debenture and the redemption amount for series A to G is Rs. 11,92,50,98,500 (including the interest accrued). In addition to the above and pursuant to Regulation 57(1) of the	BSE has waived the fine payable vide their email dated 17 th February, 2023.



			INE682V070 44, INE682V070 36, INE682V070 77.					17th February, 2023	SEBI (LODR) Regulations, 2015, the company stated that neither the interest nor the principal have been become due in any of the aforementioned ISINs. It is further stated that the redemption of all the above referred debentures are falling on May 28, 2023 (Maturity date). As per clause 4 of Schedule I – Financial terms and Conditions of the Debenture Trust deed (DTD) dated September 14, 2017, entered into with the debenture trustee, the coupon shall accrue and are payable on maturity and hence the Company is not required to make intimation under Regulation 57(1) of SEBI (LODR) Regulations, 2015.	
5.	The listed entity shall within five working days prior to the beginning of the quarter provide details for all the non-convertible securities for which interest/ dividend/ principal obligations shall be payable during the quarter	Regulation 57(4) of SEBI (LODR) Regulations, 2015	Non-submission of details of payable interest/dividend/principal obligations during the quarter in relation to the below mentioned ISINs - INE682V07069, INE682V07069,	The company had filed a waiver application dated October 6, 2022 before BSE Limited for waiving the Fine levied on the company.	BSE Limited had levied a fine of Rs. 7,000/- on the company due to the Non-submission of details of payable interest/dividend/principal obligations during the quarter vide their email dated 27 September, 2022. Further, BSE has waived the fine payable vide their email dated 17 February, 2023.	Non-submission of details of payable interest/dividend/principal obligations during the quarter.	Rs. 7,000/-	The company had filed a waiver application dated October 6, 2022 for waiving the Fine levied of Rs. 7,000/-, before BSE Limited and BSE has waived the fine payable vide their email dated	The company stated that neither the interest nor the principal have been become due in respect of any of the given ISINs. The company further stated that the redemption of all the above referred debentures are falling due only on May 28, 2023 (Maturity date). As per clause 4 of Schedule I – Financial terms and Conditions of the Debenture Trust deed	BSE has waived the fine payable vide their email dated 17 February, 2023.



			INE682V070 10, INE682V070 28, INE682V070 44, INE682V070 51, INE682V070 36					17 February, 2023.	(DTD) dated September 14, 2017, entered into with the debenture trustee, the coupon shall accrue and will be payable on maturity. In view of the above, since no interest/ dividend/ principal obligations became payable during the quarter ended June 2022, requirement of furnishing the details regarding the interest/dividend/ principal obligations was not applicable during the quarter.	
6.	The listed entity shall give notice in advance of at least seven working days (excluding the date of intimation and the record date) to the recognised stock exchange(s) of the record date or of as many days as the stock exchange(s) may agree to or require specifying the purpose of the record date.	Regulation 60(2) of SEBI (LODR) Regulations, 2015	Delay in submission of the notice of Record Date	The company has paid the fine of Rs. 10,000/- levied on the company on 30 th September, 2022.	BSE Limited had levied a fine of Rs. 10,000/- on the company vide their email dated 28 th September, 2022.	Delay in submission of the notice of Record Date	Rs. 10,000/-	The company has paid the fine of Rs. 10,000/- levied on the company on 30 th September, 2022.	The company has paid the fine of Rs. 10,000/- levied on the company on 30 th September, 2022.	The Company has paid the fine.
7.	The quorum for audit committee meeting shall either be two members or one third of the members of the audit committee, whichever is greater, with at	Regulation 18(2)(b) of SEBI (LODR) Regulations, 2015	The Audit Committee meeting held by the company on 30 th May, 2022, was attended by two directors out of which	-	-	The Audit Committee meeting held by the company on 30 th May, 2022, was attended by two directors out of which	-	As per the regulation 15 of the SEBI (LODR) Regulations, 2015, Regulation 16 to Regulation 27 have been made	As per the regulation 15 of the SEBI (LODR) Regulations, 2015, Regulation 16 to Regulation 27 have been made applicable to the company on a 'comply or explain' basis until March 31, 2023.	The Company has explained the reasons by filing revised Corporate Governance



	least two independent directors.		only one Independent Director was present.			only one Independent Director was present.		applicable to the company on a 'comply or explain' basis until March 31, 2023. Accordingly, the Company needs to explain the reasons for not duly convening the Audit Committee meeting held on 30th May, 2022.	Hence the company will explain the reasons for the Audit Committee meeting held with the presence of One Independent Director on 30th May, 2022.	e Report for the quarter ended June 30, 2022 and also in the Corporate Governance Report annexure of the Boards Report for the financial year ended 31st March, 2023.
8.	The listed entity shall within seven working days from the end of the quarter provide: (a) a certificate confirming the payment of interest/ dividend /principal obligations for non-convertible securities which were due in that quarter; and (b) the details of all unpaid interest/ dividend/ principal obligations in relation to non-convertible securities at the end of the quarter.	Regulation 57(5) of SEBI (LODR) Regulations, 2015	The company has intimated the stock exchange on 04 May, 2022 for the quarter ended 31st March, 2022 (i.e. on 04 May, 2022) and has not submitted the intimation for the Quarter ended 30th June, 2022.	-	-	The company has intimated the stock exchange at a delay for the quarter ended 31st March, 2022 and has not submitted the intimation for the Quarter ended 30th June, 2022.	-	Interest/ /principal obligations due for the quarter ended 30th June 2022, was not intimated by the company.	The Company has delayed in submission of the intimation for the quarter ended 31st March, 2022. Further, there was no interest or principal amount due for the quarter ended June 2022, Hence the company has not submitted the intimation with BSE.	The Company has been advised to file a NIL Return in case there are no interest or Principal amount due for the respective quarter.



9.	<p>The listed entity shall give prior intimation to the stock exchange of at least two working days in advance, excluding the date of the intimation and the date of the meeting of the board of directors, about the Board meeting in which any of the following proposals is to be considered –</p> <p>(a) an alteration in the form or nature of non-convertible securities that are listed on the stock exchange or in the rights or privileges of the holders thereof;</p> <p>(b) an alteration in the date of the interest/ dividend/ redemption payment of non-convertible securities;</p> <p>(c) financial results viz. quarterly or annual, as the case may be;</p> <p>(d) fund raising by way of issuance of non-</p>	Regulation 50(1) of SEBI (LODR) Regulations, 2015	<p>The company could not provide for adequate notice to the BSE for holding Board meetings on January 10, 2022, March 18, 2022, and March 24, 2022, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>	-	-	<p>The company could not provide for adequate notice to the BSE for holding Board meetings on January 10, 2022, March 18, 2022, and March 24, 2022, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>	-	<p>The company could not provide for adequate notice to the BSE for holding Board meetings on January 10, 2022, March 18, 2022, and March 24, 2022, relating to items of restructuring and fresh borrowing of Non-Convertible Debentures (NCD)</p>	<p>The Board of directors of the company have been apprised of the same at its Board Meeting.</p>	<p>The Company has been advised to ensure compliance of the regulations</p>
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	convertible securities; or (e) any matter affecting the rights or interests of holders of non-convertible securities.									
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