



PBA INFRASTRUCTURE LTD.

ISO 9001 : 2000
ISO 14001:2004
ISO 18001:2007

PBA: SE 2022

Date: 21st April, 2022

To,

The Manager Bombay Stock Exchange Limited 25 th Floor, P. J. Tower, Dalal Street, Mumbai – 400001	The Manager National Stock Exchange of India Limited Exchange Plaza, BKC , Bandra (East) Mumbai – 400051
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Sub: SEBI Circular No. CIR/CFD/CMD/27/2019 Dated February, 08, 2019 -Annual Secretarial Compliance Report for the year ended 31st March, 2022.

Ref: BSE Security Code – 532676 / NSE ISIN - INE160H01019

Dear Sir/ Madam,

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we enclosed herewith the Annual Secretarial Compliance Report issued by J.C. & Associates, Practicing Company Secretaries for the year ended 31st March, 2022.

We request you to take the above in your records.

Thanking You,
Yours Faithfully,

For PBA Infrastructure Limited

Narain P Belani
Managing Director
DIN: 02395693

Encl: A/A

**Secretarial Compliance Report of M/s PBA Infrastructure Limited
for the year ended 31st March, 2022**

I, Mrs. Jacintha Castelino, Practicing Company Secretary, (FCS No.9798, CP No. 12162) have examined:

- (a) all the documents and records made available to us and explanation provided by M/s **PBA Infrastructure Ltd (CIN: L45200MH1974PLC017653)** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stockexchanges,
- (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, 2022 (“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; **(Not Applicable to the Company 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 (Buyback of Securities) Regulations, 2018; **(Not Applicable to the Company during the review period)**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company 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 to the Company during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- (j) Securities and Exchange Board of India (Registrar to an issue and Shares Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with Client;
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2021;
- (l) Other regulations as applicable to the Company and circulars/ guidelines issued thereunder;

and based on the above examination, I/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 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
		NA	

- (b) 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/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 thereunder:



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

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.
1.	Bombay Stock Exchange Limited (BSE) And National Stock Exchange Limited (NSE)	Non Compliance of SEBI(LODR) Regulations, 2015	Suspension of Trading of Securities	Revocation of Suspension of trading in the Equity Shares of Company has been done by Bombay Stock Exchange Limited and National Stock Exchange of India Limited vide their letter dated May 21, 2021. The Trading in the securities of the company was resumed from May 31, 2021.

For JC & Associates
Company Secretaries



Jacintha Castelino
Proprietor
CP No: 12162
FCS : 9798



UDIN: F009798D000172103

Place : Mumbai
Date : 20/04/2022