

**Ajay Baroota & Associates
Company Secretaries
204, Nidhi Plaza, Plot No.8, LSC
Near Shakti Nagar Underbridge
Delhi-110052.**

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Secretarial compliance report of Tinna Rubber And Infrastructure Limited for the year ended 31st March, 2021

I, Ajay Baroota proprietor of Ajay Baroota & Associates, Company Secretaries, having office at 204, Nidhi Plaza, Plot No. 8, LSC near Shakti Nagar Under bridge, Delhi-110052 have examined:

- (a) all the documents and records made available to me and explanation provided by *Tinna Rubber And Infrastructure 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 :

- (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 as no reportable event during the period under review)**
- (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 as no reportable event during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable as no reportable event during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable as no reportable event during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable as no reportable event during the period under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable as no reportable event during the period under review)**

and circulars/ guidelines issued thereunder;

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*

- *Pursuant to Regulation(s) 30/33/47 Financial Results for the quarter ended 31st March ,2020 were considered/approved & submitted to the Stock Exchanges beyond the prescribed time /due date.*

(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 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:

<i>Sr. No.</i>	<i>Action Taken by</i>	<i>Details of Violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment, etc.</i>	<i>Observations/ Remarks of the Practicing Company Secretary, if any</i>
		NIL		

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

<i>Sr. No</i>	<i>Observations of the Practicing Company Secretary in the previous reports</i>	<i>Observations made in the secretarial compliance report for the year ended 31st March, 2020</i>	<i>Actions taken by the listed entity, if any</i>	<i>Comments of the Practicing Company Secretary on the actions taken by the listed entity</i>
1.	<i>annual listing fee for Stock Exchanges</i>	<i>Late/non payment of listing fee</i>	<i>As per records No payment due/No action required</i>	<i>No comments</i>

2.	<p><i>Pursuant to Regulation 33/47 Financial Results for the quarter ended 31st December, 2019 were considered/approved & submitted to the Stock Exchanges beyond the prescribed due date & fine has been paid by the company in terms of circular No. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018.</i></p>	<p><i>Delay in filing/reporting of financial results for the quarter ended 31st December, 2019. Fine paid by Company</i></p>	<p><i>No action required.</i></p>	<p><i>No comments</i></p>
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Place: Delhi

Date: 28th June, 2021

**For Ajay Baroota & Associates
Company Secretaries**

Prop Ajay Baroota

FCS No.: 3495

C P No.: 3945

UDIN : F003495C000532001