

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

Email: baroota@rediffmail.com

baroota_csp@yahoo.co.in

Phone : 20838555, 9868450041

Secretarial compliance report of Tinna Rubber And Infrastructure Limited for the year ended 31st March, 2022

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, 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 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 and Sweat Equity Regulations, 2021; **(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 Securities) Regulations, 2021 **(Not applicable as no reportable event during the period under review)**
- (h) 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)**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) The provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(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 thereunder, except in respect of matters specified below:-

- It was informed by the Company that one employee of the Company inadvertently sold 2000 equity shares at Rs.69.45 per share on 30.06.2022 during the closure of trading window. On receiving intimation from the employee, the Company sent/shared the details of the said transaction with the Stock Exchange under SEBI (Prohibition of Insider Trading), Regulations, 2015. The Board of Directors was appraised on the matter and the Board noted the same.

(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 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:

<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, 2021</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>
	-	NOTAPPLICABLE AS NO SUCH OBSERVATION WAS MADE IN THE PREVIOUS REPORT	-	-

Place: Delhi
Date: 29-05-2022

For Ajay Baroota & Associates
Company Secretaries

Prop Ajay Baroota
FCS No.: 3495
C P No.: 3945
UDIN : F003495D000421132
PR CERT No. 2071

NOTE: Due to COVID-19 pandemic situation besides physical verification wherever possible, also relied on soft documents/records/scanned documents as provided during the course of audit.