



IITLPL/PG/11/2021

June 29, 2021

To,
The Manager,
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
1st Floor, Dalal Street,
Mumbai – 400 001

BSE Code: 531968

**Sub.: Annual Secretarial Compliance Report of the Company for the year ended
March 31, 2021**


**Ref.: SEBI Circular CIR/CFD/CMD1/27 /2019 dated 08.02.2019 & Regulation 24A of
SEBI (LODR) Regulations, 2015**

Dear Sir/Madam,

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 & Regulation 24A of SEBI (LODR) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2021.

Thanking You,

Yours faithfully,
For **IITL Projects Limited**


Poonam Gupta
Company Secretary & Compliance Officer



Encl: A/a

Office No. 101A, "The Capital",
G-Block, Plot No. C-70,
Bandra Kurla Complex,
Bandra (East), Mumbai - 400051.

**SECRETARIAL COMPLIANCE REPORT OF IITL PROJECTS LIMITED FOR THE
YEAR ENDED MARCH 31, 2021**

We, Chandanbala Jain and Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **IITL Projects Limited (CIN: L01110MH1994PLC082421)** (“the listed entity”),
- (b) the filings / submissions made by the listed entity to the stock exchange(s),
- (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 March 31, 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 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 during the review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable during the review period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable 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 during the review period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 - **Not applicable during the review period;**
- (j) Securities and Exchange Board of India (Intermediaries) Regulations, 2008 - **Not applicable during the review period;**
- (k) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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
1.	Regulation 30 - Point 4(h) of Para A Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015: Financials Results to be intimated within 30 minutes of the closure of the Board Meeting to Stock Exchange.	(i) The Financial Results for Quarter and Year ended March 31, 2020 approved at the Board Meeting held on June 25, 2020 was filed with BSE 58 minutes after the conclusion of Board Meeting as against the time stipulated of – within 30 minutes from the conclusion of Board Meeting (ii) The Financial Results for Quarter ended June 30, 2020 approved at the Board Meeting held	The Company has informed that the delays were caused due to late receipt of the Signed Financial Results and Auditor's Report / Limited Review Report thereon from the Statutory Auditors.

		on September 10, 2020 was filed with BSE 47 minutes after the conclusion of Board Meeting as against the time stipulated of – within 30 minutes from the conclusion of Board Meeting	
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- (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:

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.
None				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended ... (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity

1.	The Company had filed the Financial Results for Quarter ending June 30, 2019 under Regulation 33 of the SEBI Listing Obligations and Disclosure Requirements) Regulations, 2015 with a delay of 4 days after the period of 45 days.	2019-2020	The Company endeavors to comply with the Regulations on time.	No such non-compliance was observed during the year under review 2020-2021
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Notes:

1. Maintenance of secretarial records is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. Due to the COVID - 19 pandemic and the restrictions faced due to the same, physical verification of documents / records have been impacted and hence reliance has been placed on the scanned / soft, copies of various documents / records which were provided by the Company.

For **Chandanbala Jain and Associates**
Practicing Company Secretaries

Chandanbala O. Mehta
Proprietor
Membership No.: FCS 6122
C.P. No.: 6400

Place: Mumbai
Date: June 23, 2021

UDIN: F006122C000510441