



इंडियन रेलवे कैंटरिंग एण्ड टूरिज्म कॉरपोरेशन लिमिटेड  
(भारत सरकार का उद्यम—मिनी रत्न)  
**INDIAN RAILWAY CATERING AND TOURISM CORPORATION LTD.**  
(A Govt. of India Enterprise-Mini Ratna)

"CIN-L74899DL1999GOI101707" E-mail : info@irctc.com Website : www.irctc.com

**No. 2019/IRCTC/CS/ST.EX/356**

**Dated: 19<sup>th</sup> May, 2023**

<b>BSE Limited</b> <b>(Through BSE Listing Centre)</b> 1 <sup>st</sup> Floor, New Trade Wing, Rotunda Building Phiroze Jeejeebhoy Towers, Dalal Street Fort, Mumbai – 400 001  <b>Scrip Code: 542830</b>	<b>National Stock Exchange of India Limited</b> <b>(Through NEAPS)</b> “Exchange Plaza”, -1, Block-G, Bandra-Kurla Complex, Bandra (East), Mumbai – 400 051  <b>Scrip Symbol: IRCTC</b>
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**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2023.**

**Sir/Madam,**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March 2023 issued by M/s Kumar Naresh Sinha & Associates, Company Secretaries.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

**For and on behalf of IRCTC Limited**

**(Suman Kalra)**

Company Secretary and Compliance Officer

Membership No.: FCS: 9199

**Encl: a/a**

**Secretarial Compliance Report of**  
**Indian Railway Catering and Tourism Corporation Limited (IRCTC)**  
**for the financial year ended March 31, 2023**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to Good corporate practices by **Indian Railway Catering and Tourism Corporation Limited (IRCTC)**, CIN: **L74899DL1999GOI101707** (hereinafter referred as 'the listed entity'), having its Registered Office at **11<sup>th</sup> Floor, B-148, Statesman House, Barakhamba Road, New Delhi -110001**. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on **March 31, 2023**, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, Kumar Naresh Sinha and Associates, have examined:

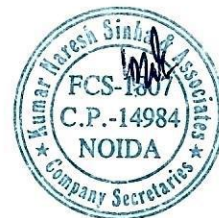
- (a) all the documents and records made available to us and explanation provided by **Indian Railway Catering and Tourism Corporation Limited (IRCTC)** ("the listed entity")
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on March 31, 2023 ("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: -

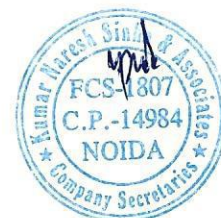
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **[Not Applicable as the listed entity has not bought back/propose to buy-back any of its securities during the Review Period];**



- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not applicable as the listed entity has not offered any shares or granted any options pursuant to any employee benefit scheme during the Review Period];**
- (f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **[Not applicable as the listed entity has not issued and listed any non-convertible securities during the Review Period]**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 **(to the extent applicable)**

We 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.	<p><b><u>Secretarial Standard:</u></b></p> <p>The compliances of the listed entities are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118 (10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	None
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity.</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	<p>Yes</p> <p>Yes</p>	<p>None</p> <p>None</p>
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>None</p> <p>None</p> <p>None</p>





4.	<b><u>Disqualification of Director:</u></b>  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	None
5.	<b><u>To examine details related to Subsidiaries of listed entities:</u></b>  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA NA	The listed entity does not have any subsidiary.
6.	<b><u>Preservation of Documents:</u></b> 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	None
7.	<b><u>Performance Evaluation:</u></b>  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.	NA	-  Ministry of Corporate Affairs (MCA) vide its circular dated June 5, 2015, has exempted Government Companies from the provisions of section 178(2) of the Companies Act, 2013, which requires performance evaluation of every director by the Nomination & Remuneration Committee. The circular further exempted Govt. Companies from the provisions of Section 134 (3) (p) of Companies Act 2013, which provide about manner of formal evaluation of its own performance by the Board and that of its Committees and Individual Director in Board's Report, if directors are evaluated by the Ministry which is administratively in-charge of the Company as per its own evaluation methodology. Further, MCA vide notification dated July 5, 2017, also prescribed that the provisions relating to review of performance of Independent Directors and evaluation mechanism prescribed in



			<p>Schedule IV of the Companies Act, 2013, is not applicable to Government companies.</p> <p>In IRCTC, the evaluation of performance of Functional Directors includes self-evaluation by the respective functional directors and subsequent assessment by CMD with final evaluation by the Ministry of Railways.</p> <p>The performance evaluation of CMD includes self-evaluation and final evaluation by the Ministry of Railways.</p> <p>In respect of Government nominee directors, their evaluation is done by the Ministry of Railways as per the procedure laid down.</p> <p>Since independent directors are appointed by the administrative ministry, their evaluation is also done by the Ministry of Railways and Department of Public Enterprises.</p>
8.	<p><b><u>Related Party Transactions:</u></b></p> <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>	NA	<p>The Company has undertaken transactions with related parties (Ministry of Railways, Government of India, Government companies / departments under Ministry of Railways, such as CRIS, Raitel and RVNL) during the year in the ordinary course of business and at arm's length. The disclosures related to RPTs in accordance with applicable accounting standards are placed before the Audit Committee on quarterly basis and the disclosure on the same are also provided under notes to accounts, forming part of financial statements of the</p>



			Company.  Further, the Company has no operative Joint Venture and Subsidiary Company.
9.	<b><u>Disclosure of events or information:</u></b>  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.	Yes	None
10.	<b><u>Prohibition of Insider Trading:</u></b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b>  No action(s) 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 (para a).	No	Mentioned in para (a) below.
12.	<b><u>Additional Non-compliances, if any:</u></b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	None

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS
1.	<b>Compliances with the following conditions while appointing / re-appointing an auditor</b>		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	None
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/	NA	None





	<p>audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA	None
<b>2.</b>	<b>Other conditions relating to resignation of statutory auditor</b>		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee of the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be,</p>	<p>NA</p> <p>NA</p> <p>NA</p> <p>NA</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>



	<p>deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity / its material subsidiary has not provided information as required by the auditor.</p>	NA	None
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	NA	None



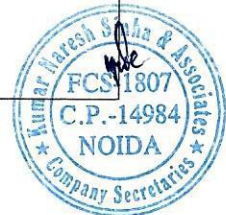


(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

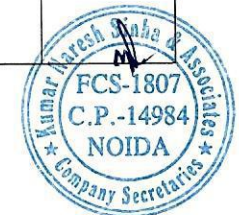
Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation /Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/ Fine/Show Cause Notice/Warning, etc.)	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	<p>The Board of Directors of the top 1000 listed entities shall have at least one independent woman director.</p> <p>Where the listed entity does not have a regular non-executive chairperson, at least half of the board of directors shall comprise of independent directors.</p>	Regulation 17(1) of SEBI (LODR) Regulations, 2015	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint independent woman director	BSE and NSE	Fine	Half of the Board was not Independent and no Independent Woman Director on the Board of the Company for the quarter ended June 30, 2022, September 30, 2022, and December 30, 2022.	BSE & NSE vide mail / letter dated 22.08.2022, 21.11.2022 and 21.02.2022 levied fine of Rs. 4,55,000/- plus GST @ 18% of Rs. 81,900/- each for Q.E June 30, 2022, and December 30, 2022, and Rs. 4,60,000/	Indian Railway Catering and Tourism Corporation Limited (IRCTC) is a Government Company as defined under section 2(45) of Companies Act, 2013, under the administrative control of Ministry of Railways. Also, President of India acting through	In order to comply with the requirements of Regulation 17(1), the company is constantly following up with the Ministry of Railways, Govt. of India for appointment of requisite number of Independent Directors including a women Independent Director on the Board of the Company.	None



						<p>r 31 2022. BSE and NSE have imposed fines for the non- compliance with the requirements prescribed under regulation 17(1) of SEBI (LODR), Regulations, 2015 for the quarters ending June 30, 2022, September 30, 2022, and December 31 2022, as mentioned in the adjacent column. The</p>	<p>- plus GST@ 18% of Rs. 82,800/- each for Q.E September 30, 2022, and December 31, 2022.</p>	<p>Ministry of Railways holds 62.40% of share capital of the Company. Accordingly, the power to appoint directors on its Board vests with President of India, in accordance with the Article No. 58 (e) of Articles of Association of the Company.</p> <p>Being a Government Company, IRCTC has proactively taken up the issue with the Ministry of Railways, Government of India, i.e., the appointing authority,</p>	
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						<p>above non-compliance, however, continued for the quarter ended 31<sup>st</sup> March 2023 also.</p>	<p>from time to time, for appointment of the requisite number of independent directors, including Independent Women Director on the Board.</p> <p>The issue of filling up of the requisite number of independent directors including one (01) woman director is being regularly followed up with the Administrative Ministry (i.e., Ministry of Railways, Govt. of India).</p>		
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(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/Find/Show Cause Notice/Warning, etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
<b>(a) Pertaining to the year ended March 31, 2022</b>										
1.	The Board of Directors of the top 1000 listed entities shall have at least one independent woman director.  Where the listed entity does not have a regular non-executive chairperson, at least half of the board of directors shall comprise of independent directors.	Regulation 17 (1) of SEBI (Listing Obligations and Disclosure Requirements), 2015.	The composition of Board didn't comprise of sufficient number of independent directors including one Woman Independent Director during the period under review.	BSE and NSE	Fine	Half of the Board was not Independent and no Independent Woman Director on the Board of the Company during FY 2021-22.	BSE & NSE levied fine of Rs. 4,55,000/- plus GST @ 18% of Rs. 81,900/- each for Q.E. June 30, 2021, Rs. 4,60,000/- plus GST @ 18% of Rs. 82,800/- each for Q.E. September 30, 2021, & December 31, 2021 and Rs.4,50,000/- plus GST @ 18% of Rs.81,000/- each for Q.E.	The non-compliance with the requirements prescribed under regulation 17(1) of SEBI (LODR), Regulations, 2015 in the report of the previous year has not been complied so far.  In this regard, we have observed that Indian Railway Catering and Tourism Corporation Limited (IRCTC) is a Government Company [as defined under section 2(45) of	In order to comply with the requirements of Regulation 17(1), the company is constantly following up with the Ministry of Railways, Govt. of India for appointment of requisite number of Independent Directors including a women Independent Director on the Board of	None



							<p>March, 31, 2022.</p> <p>Companies Act, 2013], under the administrative control of Ministry of Railways. Also, President of India acting through Ministry of Railways holds 62.40% of share capital of the Company.</p> <p>Accordingly, the power to appoint directors on its Board vests with President of India, in accordance with the Article No. 58 (e) of Articles of Association of the Company.</p> <p>Being a Government Company, IRCTC has proactively taken up the issue with the Ministry of Railways, Government of India, i.e., the appointing authority, from time to time, for appointment of</p>	the Company.	
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								<p>the requisite number of independent directors, including Independent Women Director on the Board.</p> <p>The issue of filling up of the vacancies of requisite number independent directors including one (01) woman director is being regularly followed up with the Administrative Ministry (i.e., Ministry of Railways, Govt. of India).</p>		
2.	<p>Every listed entity shall constitute a qualified and independent audit committee.</p> <p>The board of directors shall constitute the nomination and</p>	<p>Regulation 18, 19, 20 &amp; 21 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requireme</p>	<p>The composition of the Board Level Committees i.e., Audit Committee, Nomination &amp; Remuneration Committee, Stakeholders Relationship</p>	<p>BSE and NSE</p>	<p>Fine</p>	<p>The composition of the Board Level Committees i.e., Audit Committee, Nomination &amp; Remuneration Committee, Stakeholders Relationship Committee and Risk Management Committee were not in compliance</p>	<p>BSE- Fine amount of Rs.15,52,000 /- plus GST @18 Rs.2,79,360/- amounting to Rs.18,31,360 /-.</p> <p>NSE- Fine</p>	<p>NSE vide letter NSE/LIST/SOP/073 2 dated 10.11.2022 have waived fine imposed on the company for non-compliance of:</p> <p>(a) Regulation 17 (2A) for quarter ended June 30, 2021, September</p>	<p>With the appointment of two (02) independent directors, Mr. Vinay Kumar Sharma and Mr. Namgyal Wangchuk on the Board of the Company w.e.f. 9<sup>th</sup> November</p>	





remuneration committee.  The listed entity shall constitute a Stakeholders Relationship Committee.  The board of directors shall constitute a Risk Management Committee.	nts) Regulations, 2015.	Committee and Risk Management Committee were not in compliance during the period under review.			during the period under review.	amount of Rs.15,52,000/- plus GST @18 Rs.2,79,360/- amounting to Rs.18,31,360/-.	30, 2021 & December 31, 2021.  b) Regulation 18 for quarter ended June 30, 2021, September 30, 2021 & December 31, 2021 & March 31, 2022.  c) Regulation 19(1)/19(2) for quarter ended June 30, 2021, September 30, 2021 & December 31, 2021.  d) Regulation 20(2)/(2A) for quarter ended June 30, 2021, September 30, 2021 & December 31, 2021.  e) Regulation 21(2) for the quarter ended September 30, 2021 & December 31, 2021.	2021 and 12 <sup>th</sup> November 2021 respectively, the Committees of the Board i.e., Audit Committee, Nomination & Remuneration Committee, Stakeholders Relationship Committee & Risk Management Committee, were reconstituted in accordance with the requirements as prescribed under SEBI (LODR) Regulations, 2015.  The same was compiled as on 31.03.2022.	
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3.	Preparation of financial results	The Company has not complied with the provision of Regulation 33 of the SEBI (LODR) Regulations, 2015.	The Company has not prepared the consolidated financial Statement as required under the SEBI (LODR) Regulations, 2015.	None	None	The Company has not complied with the provision of Regulation 33 of the SEBI (LODR) Regulations, 2015.	-NIL-	The Company has not prepared the consolidated financial Statement as required under the SEBI (LODR) Regulations, 2015.	The Company is not able to prepare the consolidated financial Statement of its Joint Venture (JV), Royale India Rail Tours Limited (RIRTL) since Fiscal 2011 on account of ongoing litigation with Cox & Kings Limited (the JV partner with 50% share), and unavailability of financial statements of the RIRTL. and also, the matter being sub-judice before National Company Law Tribunal (NCLT). Cox & Kings Limited had also
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									initiated arbitration proceedings seeking restoration of the Joint Venture Agreement. The arguments have been concluded on 28.02.2023 and the arbitral award is awaited.	
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**(b) Pertaining to the year ended March 31, 2021**

1.	The Board of Directors of the top 1000 listed entities shall have at least one independent woman director.  Where the listed entity does not have a regular non-	Regulation 17 (1) of SEBI (Listing Obligations and Disclosure Requirements), 2015.	The Board of Directors does not consist of independent women director on the Board of Company w.e.f. 29th March 2021.  The composition of the Board	BSE & NSE	Fine	Due to completion of tenure of only women independent director Ms. Sarita Deshpande on 28 <sup>th</sup> March 2021, there was no Independent women director on the board of the company w.e.f. 29 <sup>th</sup> March, 2021.	BSE & NSE levied fine of Rs. 4,60,000/- plus GST @ 18% of Rs. 82,800/- each for Q.E. December 31, 2020.  BSE & NSE levied fine of Rs. 4,50,000/-	The power to appoint Directors on the Board of Company vests with President of India (Pol) in accordance with its Articles of Association. Ministry of Railways, Government of India has been requested on regular basis to	In order to comply with the requirements of Regulation 17(1), the company is constantly following up with the Ministry of Railways, Govt. of India for appointment	
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executive chairperson, at least half of the board of directors shall comprise of independent directors.		didn't comprise of sufficient number of independent directors as on 31st March, 2021.			<p>The composition of Board is not in compliance with Regulation 17 (1) (b) of SEBI (LODR) Regulations, 2015 due to insufficient number of Independent Directors on the Board during the period under review as mentioned below:</p> <p>Q1- 3 Vacancies Q2- 3 Vacancies Q3- 5 Vacancies Q4- 6 Vacancies</p> <p>The company could not have optimum combination of functional, nominee and independent directors during the FY 2020-21.</p>	plus GST @ 18% of Rs. 81,000/- each for Q.E. March 31, 2021.	appoint sufficient number of independent directors on the Board of the Company in order to avoid non-compliance of SEBI (LODR), Companies Act and other applicable laws.	of requisite number of Independent Directors including a women Independent Director on the Board of the Company.	
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**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 certify 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 the 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.

Place: Noida  
Date: May 18, 2023



**For Kumar Naresh Sinha & Associates**  
**Company Secretaries**

**CS Naresh Kumar Sinha**  
**(Proprietor)**

**FCS: 1807, CP No.: 14984**

**PR: 610/2019**

**FRN: S2015UP440500**

**UDIN: F001807E000331444**