

Aditri Gems & Jewels Industries Limited

(Formerly Aditri Industries Limited)

CIN: L36999GJ1995PLC025177

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Date: 30.06.2021

To, The Manager-Listing, BSE Limited PhirozeJeejeebhoy Towers, Dalal Street, Kala Godha, Fort, Mumbai- 400 001 Script Code: 534707	To, Assistant Vice-President- Listing, Metropolitan Stock Exchange of India Limited Vibgyor Towers, 4th Floor, Plot No. C 62, G-Block Opp. Trident Hotel, Bandra Kurla Complex, Bandra (E), Mumbai- 400098 Script Code: ADITRI
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Dear Sir/Madam,

Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

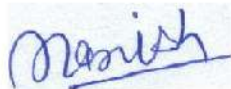
In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose Secretarial Compliance Report duly issued by Mr. Ankur Singh, Practising Company Secretary, for the financial year ended March 31, 2021.

Kindly take the above on records.

Thanking You.

Yours Faithfully,

FOR ADITRI GEMS & JEWELS INDUSTRIES LIMITED



**MANISH SHARMA
MANAGING DIRECTOR
DIN: - 08976035**

Registered Office: G.F. 012, Satyam Mall, Opp. Saman Complex,
Near Vishweshwar Mahadev Mandir, Satellite, Ahmedabad 380015
Corporate Office: Flat No. 505 along with CPS No. Lb-23,
Anriksh Bhawan 22, K.G Marg, New Delhi 110001 DL IN

Web: www.aditriindustries.co.in
E-mail: anshusclothing@gmail.com
Ph. No: 07289099938



ANKUR SINGH
Practicing Company Secretary
123-A, A-5 Block, Near Indraprastha School,
Paschim Vihar, New Delhi-110063.
PH. No -9711936784, Email Id - pcsankursingh@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT

(Under Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements)
Regulations, 2015

To,
ADITRI GEMS & JEWELS INDUSTRIES LIMITED
(FORMERLY KNOWN AS ADITRI INDUSTRIES LIMITED)
G.F-012- Satyam Mall, Opp. Saman Complex,
Near Vishweshwar Mahadev Mandir,
Satellite Ahmedabad, Gujarat -380015

I have examined:

All the documents and records made available to me and explanation provided by **ADITRI GEMS & JEWELS INDUSTRIES LIMITED** ("the listed entity"),

- a) the filings/ submissions made by the listed entity to the stock exchanges,
- b) website of the listed entity,
- c) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31 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
- 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 Audit Period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;(Not Applicable to the Company during the Audit Period)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;(Not Applicable to the Company during the Audit 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 Audit Period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (herein after as "Insider Trading Regulation")
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client.

Circulars/ guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:

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

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	Regulation 47 SEBI (LODR), 2015: - Advertisement in Newspapers.		Company did not submitted the Newspaper Publication to the stock Exchange according to



		regulation 47 (2) of SEBI (LODR), 2015
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- b) This listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder but the physical inspection was not possible due to Covid-19 pandemic.
- c) No 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 with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous report	Observations made in the Secretarial Compliance Report for the year ended 31.03.2020 (the years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the practicing company secretary on the actions taken by the listed entity.
01	Regulation 6 of SEBI (LODR), 2015	The Company has not appointed a Qualified Company Secretary & Compliance officer	The Listed Company has appointed Company Secretary.	The Listed Company has appointed Company Secretary.

Place: - New Delhi

Date: -30.06.2021

UDIN: - A060761C000547071



(ANKUR SINGH)

Practicing Company Secretary

Membership No: - A60761

COP No: -22820