



D. A. Kamat & Co Company Secretaries

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To,
The Board of Directors
Arihant Superstructures Limited
"Arihant Aura" 25th Floor, B-Wing, Plot No. 13/1,
TTC Industrial Area, Thane Belapur Road,
Turbhe, Navi Mumbai - 400705

Subject: Annual Secretarial Compliance Report for Financial Year 2020-21.

Dear Sirs,

We have been engaged by **ARIHANT SUPERSTRUCTURES LIMITED** (hereinafter referred to as the 'Company') bearing CIN: L51900MH1983PLC029643 whose equity shares are listed on BSE Limited to conduct an audit in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner, which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For the purpose of this Certificate, the submissions, records and documents maintained were checked electronically due to prevailing lockdown situation for the period up to March, 2021, based on the submissions received from the management of the Company.

For D. A. Kamat & Co
Company Secretaries



D.A. Kamat
Partner
FCS 3843
CP 4965

UDIN: F003843C000484026

Date: 18.06.2021
Place: Mumbai



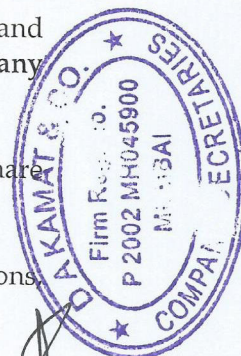
Secretarial compliance report of Arihant Superstructures Limited for the Financial Year ended on 31st March 2021

We, M/s D. A. Kamat & Co, Company Secretaries, have examined:

- a) All the documents and records made available to us and explanation provided by **ARIHANT SUPERSTRUCTURES 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:
 - i. The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - ii. 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 -

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
2. Securities and Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations, 2018
3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
4. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- Not Applicable to the Company during the year under review.
5. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - Not Applicable to the Company during the year under review.
6. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- Not Applicable to the Company during the year under review.
7. 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 year under review.
8. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993
9. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 - Not Applicable to the Company during the year under review.



[Handwritten Signature]



and based on the above examination, we hereby report that, during the Financial Year ending on 31st March 2021:

- 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/ guidelines including specific clause)	Deviations	Observations/ Remarks of Practicing Company Secretary
	NIL	NIL	NIL

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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	Details of action taken (eg. Fines, Warning Letter, debarment. etc.)	Observations/ remarks of the Practicing Company Secretary, if any
1	Shri Dinesh Babel had undertaken certain transactions in the securities including contra entries during Financial Year 2017-18, during the closure of trading window and the Company has not intimated to the concerned stock exchanges. Further, SEBI has issued a Show Cause notice against the Company and then Company has submit the reply against the Show Cause Notice. Further, after the hearing between the company and concerned authority between SEBI, SEBI has issued Adjudication order under Section 15-I of SEBI Act, 1992 read with Rule 5 of SEBI (procedure for Holding Inquiry and Imposing Penalties by Adjudicating officer)	SEBI has imposed a penalty of Rs. 2,00,000/- to the Company under the Provisions of Section 15A(b) of the SEBI Act, 1992	The Company has confirmed that they have deposit the said penalty amount within due time limit.





Rules, 1995 vide Adjudication order No. Order/BD/AB/2020-21/9454 dated 27 th October, 2020 in the matter of Section 15A(b) of the SEBI Act, 1992.		
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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 end	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Submission of Financial Results for the Quarter ended March 2019.	FY 2019-20	The Company has submitted the revised and correct copy of the Audited Financial Statements (Stand-alone & Consolidated) along with the unmodified opinion of the Statutory Auditors in the required format on 18 th June, 2020.	The Company has confirmed that they have complied the necessary submission to the concerned Stock Exchanges

For D. A. Kamat & Co
Company Secretaries



D.A. Kamat^l
Partner
FCS 3843
CP 4965

Date: 18.06.2021
Place: Mumbai

UDIN: F003843C000484026