

Pramod S. Shah & Associates

Practising Company Secretaries

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Secretarial Compliance Report of Gammon India Limited for the year ended 31st March, 2022

We have examined:

- a) all the documents and records made available to us and explanation provided by Gammon India Limited ("the Company");
- b) the filings/ submissions made by the listed entity to the stock exchanges;
- c) website of the Company;
- 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;
- c) The Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992 and amendments made from time to time;



- d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable to the Company during the Review Period;**
- f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable to the Company during the Review Period;**
- h) 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 Review Period;**
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) any other regulations and circulars/ guidelines issued thereunder; as may be applicable to the Company.

and based on the above examination, we hereby report that, during the Review Period:

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

Serial No.	Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	As per Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 The listed entity shall submit quarterly and yearly standalone financial results to the stock exchange within forty-five days of end of each quarter, (other than last quarter) along with Limited Review Report or Audit Report as	Delay in submission and publishing of Financial Results	The Company had delayed the submission of the financial statement for quarter ended, June 2021, December 2021 and year ended March, 2022. For the Quarter and Half Year ended September 2021 - Published and filed with the Stock Exchanges on 23 rd February, 2022



	applicable.		For the Quarter ended June, 2021- published and filed with the Stock Exchange on 15 th September For the Quarter ended December 2021- Published and filed with the Stock Exchanges on 23 rd February, 2022
2.	<p>As per Regulation 13 (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015</p> <p>The listed entity shall file with the recognised stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.</p>		The Company has not filed Statement on Investor Grievance under Regulation 13 (3) for the quarter ended March, 2022.
3.	Secretarial Standards (SS - 1, SS - 2, SS - 3 and SS - 4) issued by the Institute of the Company Secretaries of India (ICSI).		The Secretarial Standards were complied to the extent possible.
4.	As per Regulation 98(1) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015; the listed entity or any other person thereof who contravenes any of the provisions of these regulations, shall, in addition to liability for action in terms of the securities laws, be liable		The Company's trading has been suspended due to penal reasons.



	for the following actions by the respective stock exchange(s), in the manner specified in circulars or guidelines issued by the Board: (a) holding of designated securities, as may be applicable, in coordination with depositories.		
5.	As per Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015; the listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the Board on the recognised stock exchange(s).		The Company has not paid fees for the period March, 2022. However, they informed us that they will pay fees shortly.

- 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: - NIL

Serial No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary
1.				

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



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

Date: 30/05/2022

Place: Mumbai

Signature:



Pramod S. Shah - Partner

M/s. Pramod S. Shah & Associates

Practising Company Secretary

Membership No.: F334

C P No.: 3804

UDIN: F000334D000429510