

PRAMOD S. SHAH AND ASSOCIATES
PRACTISING COMPANY SECRETARIES
Address: 3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P D' Mello Road, Opp.
St. George Hospital, Near CST, Mumbai-400 001.
Cell No.: 99308 99047/ 99875 26217; Tel No.: +91 22 22717700/ +91 22 22701040;
Email Id: pramodshah361@gmail.com; Website: www.cspssa.co.in

Secretarial Compliance Report of Gammon India Limited for the year
ended 31st March, 2021

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, 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;

**PRAMOD S. SHAH AND ASSOCIATES
PRACTISING COMPANY SECRETARIES**

**Address: 3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P D' Mello Road, Opp.
St.George Hospital, Near CST, Mumbai-400 001.**

Cell No.: 99308 99047/ 99875 26217; Tel No.: +91 22 22717700/ +91 22 22701040;

Email Id: pramodshah361@gmail.com; Website: www.cspssa.co.in

- 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	Delay in submission and publishing of Financial Results	The Company had delayed the submission of the financial statement for quarter ended

**PRAMOD S. SHAH AND ASSOCIATES
PRACTISING COMPANY SECRETARIES**

Address: 3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P D' Mello Road, Opp.

St. George Hospital, Near CST, Mumbai-400 001.

Cell No.: 99308 99047/ 99875 26217; Tel No.: +91 22 22717700/ +91 22 22701040;

Email Id: pramodshah361@gmail.com; Website: www.cspssa.co.in

	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 applicable.		March, 2020 and year ended March, 2020. For the Quarter and Half Year ended March 2020 - Published and filed with the Stock Exchanges on 14 th August, 2020 For the Quarter ended June 2020 - Published and filed with the Stock Exchanges on 15 th September, 2020
2.	As per FEMA Circular of RBI - A.P. (DIR Series) Circular No. 133 dated June 20, 2012 which stipulates all Indian Companies who have received FDI and/ or have made FDI abroad (i.e. overseas investment) in the previous year(s) including the current year, should file the annual return on Foreign Liabilities and Assets (FLA) in the soft form which can be duly filled-in, validated and sent by e-mail to the Reserve Bank by July 15 of every year.		The Company has filed annual return on Foreign Liabilities and Assets (FLA) but not within the stipulated time because the Financial Statements of the Company were not ready.
4.	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
5.	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 for the following actions by the respective stock exchange(s), in the manner specified		The Company's trading has been suspended due to penal reasons.

**PRAMOD S. SHAH AND ASSOCIATES
PRACTISING COMPANY SECRETARIES**

Address: 3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P D' Mello Road, Opp.
St. George Hospital, Near CST, Mumbai-400 001.

Cell No.: 99308 99047/ 99875 26217; Tel No.: +91 22 22717700/ +91 22 22701040;

Email Id: pramodshah361@gmail.com; Website: www.cspso.co.in

in circulars or guidelines issued by the Board: (a) holding of designated securities, as may be applicable, in coordination with depositories.		
--	--	--

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 Practicing Company Secretary
1.	NIL			

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

Serial 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)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

**PRAMOD S. SHAH AND ASSOCIATES
PRACTISING COMPANY SECRETARIES**

**Address: 3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P D' Mello Road, Opp.
St.George Hospital, Near CST, Mumbai-400 001.**

Cell No.: 99308 99047/ 99875 26217; Tel No.: +91 22 22717700/ +91 22 22701040;

Email Id: pramodshah361@gmail.com; Website: www.cspsa.co.in

Signature:

Date: May 7, 2021

Place: Mumbai

Pramod S. Shah - Partner

M/s. Pramod S. Shah & Associates

Practising Company Secretary

FCS No.: 334

C P No.: 3804

UDIN: F000334C000254491