A. CHADHA & ASSOCIATES
Company Secretaries
Plot no. 328, Sector-31 Gurgaon
9810145513
Email: arvindchadha@yahoo.com

SECRETARIAL COMPLIANCE REPORT OF CHL LIMITED
[CIN: L55101DL1979PLC009498]

FOR THE YEAR ENDED 31ST MARCH, 2021

1. We have examined:
   (a) the documents and records made available to us and explanation provided by CHL Limited ("the listed entity"),
   (b) the filings/ submissions made by the listed entity to the stock exchange,
   (c) 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");

2. 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; **Not applicable to the Company during the financial year.**
   (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 financial year.**
   (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable to the Company during the financial year.**
   (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable to the Company during the financial year.**
   (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 financial year.**
   (h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **Not applicable to the Company during the financial year.**

(j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines as applicable and issued thereunder.

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

(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)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	Reg. 13(3) – Statement of Investor Complaints	Not filed within the stipulated time.	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 10.08.2020, the required document was submitted.
2	Regulation 23(9) (Listing Obligations and Disclosure Requirements) Regulations, 2015, Related Party Transaction	Not filed within the stipulated time.	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 08.02.2021, the required document was submitted.
3.	Regulation 27(2) (pertaining to Corporate Governance Report) for the quarter ended June 2020	Not filed within the stipulated time.	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 21.08.2020, the required document was submitted and levied penalty was paid.
4.	Reg. 31 – Shareholding Pattern	Not filed within the	Due to Covid -19 Pandemic, the

		stipulated time.	nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 04.08.2020, the required document was submitted.

(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 my/our examination of those records.

(c) The following are the details of action taken against the listed entity/ its promoters/ directors/ material subsidiary either by SEBI or by Stock Exchange (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 by	Details of violation	Details of action taken E.G. fines, warning letter, debarment etc	Observations/remarks of the Practicing Company Secretary, if any
1.	BSE	Reg. 13(3) – Statement of Investor Complaints	Show cause notice issued and penalty levied.	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 10.08.2020, the required was submitted.
2		Regulation 23(9) (Listing Obligations and Disclosure Requirements) Regulations, 2015, Related Party Transaction	-	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 08.02.2021, the required documents was submitted.
3.	BSE	Regulation	Show cause	Due to Covid -19

		27(2) (pertaining to Corporate Governance Report) for the quarter ended June 2020	notice issued and penalty levied.	Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre and office was closed. On 21.08.2020, it was submitted and levied was penalty was paid.
4.	BSE	Reg. 31 – Shareholdin g Pattern	Show cause notice issued and penalty levied.	Due to Covid -19 Pandemic, the nationwide lockdown and the linking of Hotel as Covidcare centre, the office was closed. On 04.08.2020, the required document was submitted.

(d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

(e) The Listed entity has complied with the provisions of 6(A) & 6 (B) of SEBI Circular No.: CIR/CFD/CMD1/114/2019 dated 18th October, 2019.

Place: New Delhi
Date: 21.06.2021

For A. Chadha & Associates,
Company Secretaries

(ARVIND CHADHA)
Prop. Membership No.: 5271
UDIN: F005271C000490657

A. Chadha & Associates
C. P. 5732
Company Secretaries