

PANTH Infinity

INTENDED TO INSPIRE

30th May, 2022

To, The Corporate Relations Department BSE Limited PhirozeJeejeebhoy Towers, Dalal street, Mumbai-400001, Maharashtra. BSE Code: 539143	To, The Listing Department The Calcutta Stock Exchange Limited 7, Lyons Range, Dalhousie, Murgighata, B B D Bagh, Kolkata-700001, West Bengal. CSE Code: 30010
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Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022.

Dear Sir/Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular no. CIR/CFD/CMD 1/27/2019 dated February 08, 2019, we are enclosing herewith Secretarial Compliance Report for the year ended 31st March, 2022 issued by Mr. Manish R. Patel, Practicing Company Secretary, Surat.

Kindly take the same on your record and oblige.

Thanking you.

Yours faithfully,
For PANTH INFINITY LIMITED

JINAY KORADIYA
Chairman & Managing Director
DIN: 03362317



PANTH INFINITY LIMITED | CIN : L45201GJ1993PLC114416

Registered Office : 101, Siddh Chambers, Taratiya Hanuman Street, Gurjar Faliya, Haripura, Surat-395003, Gujarat.



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MANISH R. PATEL

Company Secretary & Trade Mark Agent
M.Com, DTP, DLP, ACS

105, 1st Floor, Meghani Tower, Cinema Road, Delhi Gate, Surat - 395 003, Gujarat, Tel: 0261 - 2601717, 3911717

**SECRETARIAL COMPLIANCE REPORT
OF
PANTH INFINITY LIMITED
(CIN: L45201GJ1993PLC114416)
FOR THE YEAR ENDED 31ST MARCH, 2022**

I, Manish R. Patel, Practicing Company Secretary, Surat has examined:

- (a) all the documents and records made available to us either physically or by way of email and explanation provided by Panth Infinity 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, 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 (**during the period under review not applicable to the Company**);
- (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 (**during the period under review not applicable to the Company**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**during the period under review not applicable to the Company**);



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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(during the period under review not applicable to the Company);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(during the period under review not applicable to the Company);**
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(during the period under review not applicable to the Company);**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2018 **(during the period under review not applicable to the Company);**

and 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 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	Regulation 6 of SEBI (LODR) Regulations, 2015	Non appointment of Company Secretary as Compliance Officer of the Company.	The Company has not appointed qualified Company Secretary as Compliance Officer of the Company for a period from 01-08-2021 to 10-02-2022.
2	Regulation 14 of SEBI (LODR) Regulations, 2015	Non Payment of Listing fees within prescribed time limit.	The Company has paid listed fees to BSE on 10-12-2021 and CSE on 28-02-2022.
3	Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015	The composition of the Board of Directors are not in terms of the SEBI (LODR) Regulations, 2015.	Pursuant to market capitalization criteria, the Company shall require to appoint minimum Six (6) Directors on its Board w.e.f. 01-04-2020. As on Report date, the Company comprises only Four (4) Directors on the Board due to resignation of Two (2) Independent Directors on 30-09-2021.



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4	Regulation 25(6) of SEBI (LODR) Regulations, 2015	Non appointment of Independent Director to fill casual vacancy caused by resignation of existing Independent Director.	Pursuant to Regulation 25(6) read with Regulation 17(1) of the SEBI (LODR) Regulations, 2015, the Company shall require minimum Three (3) Independent Directors on its Board.
5	SEBI Circular No.: SEBI/HO/CFD/DCR1/ CIR/P/2018/85 dated 28 th May, 2018: Non submission of information to Designated Depository	Non submission of information in time with Designated Depository.	Pursuant to requirement of System Driven Disclosure Circular, the Company has not submitted requisite information in time to the Designated Depository.

- (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 examination of those records.
- (c) The listed entity has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in the terms of appointment of Statutory Auditors of the listed entity.
- (d) 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 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	CSE	Non Payment of Annual Listing Fees	Suspended w.e.f. 26 th April, 2021	The Company has paid its Annual Listing Fees for FY 2019-20 and FY 2020-21. The Company is in process for revocation of suspension.

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



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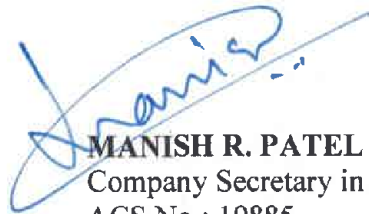
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Sr. No.	Observations of the Practicing Company Secretary in the previous Report	Observation made in the Secretarial compliance report for the year ended (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
1.	Regulation 14 of SEBI (LODR) Regulations, 2015	2020-21	The Company has paid Annual Listing Fees for FY 2020-21 to BSE on 12-11-2020 and CSE on 29-04-2021.	No Comment
2.	Regulation 17 of SEBI (LODR) Regulations, 2015	2020-21	The Company has complied with the requirement by appointing Mrs. Neha Saurabh Patel as an Additional Non-Executive Director and Ms. Sweety Kanaiyalal Rana as an Additional Non-Executive Independent Director w.e.f. 01-09-2020.	The action taken by the listed entity is satisfactory.
3.	Regulation 27(2) of SEBI (LODR) Regulations, 2015	2020-21	During the year, the Company has filed Quarterly Corporate Governance Report (QCGR) within prescribed time.	The action taken by the listed entity is satisfactory.




MANISH R. PATEL
Company Secretary in Practice
ACS No.: 19885
COP No.: 9360

Peer Review No. : 929/2020

ICSI Unique Code: I2010GJ763400

UDIN: A019885D000418426

Date: 28/05/2022

Place: Surat

Note: This report is to be read with our letter of even date which is annexed as 'ANNEXURE A' and forms an integral part of this report.

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ANNEXURE - A

To,

Panth Infinity Limited

(CIN: L45201GJ1993PLC114416)

101, Siddh Chambers, Taratiya Hanuman Street,

Gurjar Faliya, Haripura,

Surat – 395003, Gujarat.

Our report of even date is to be read along with this letter.

1. Maintenance of record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of SEBI laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
5. As regards the books, papers, forms, reports and returns filed by the Company under these regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the Company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.



Date: 28/05/2022

Place: Surat

MANISH R. PATEL

Company Secretary in Practice

ACS No.: 19885

COP No.: 9360

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