

PANTH Infinity

INTENDED TO INSPIRE

31st July, 2020

To, BSE Limited The Department of Corporate Services P. J. Towers, Dalal street, Mumbai-400 001, Maharashtra. BSE Code: 539143	To, The Calcutta Stock Exchange Limited The Compliance Department 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, 2020.

Dear Sir/Madam,

Pursuant to SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Secretarial Compliance Report for the year ended 31st March, 2020 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

RICKY KAPADIA

Company Secretary & Compliance Officer
ACS No.: 60440



PANTH INFINITY LIMITED | CIN : L45201GJ1993PLC114416

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



+91-70439 99011



info@panthinfinity.com

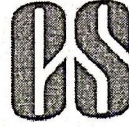


www.panthinfinity.com

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MANISH R. PATEL

Company Secretary & Trade Mark Agent
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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, 2020.**

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 in view of the prevailing pandemic situation of COVID -19 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, 2020 ("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 (during the period under review not applicable to the Company);



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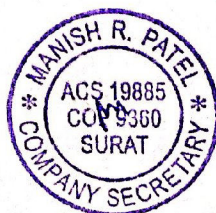
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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**during the period under review not applicable to the Company**);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**during the period under review not applicable to the Company**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

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:-

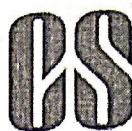
Sr. No.	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Regulation 6(1) of SEBI (LODR) Regulations, 2015	The Company has not appointed a qualified Company Secretary as the Compliance Officer of the Company for a period from 01-06-2019 to 18-03-2020.	During discussion with the Company Officials, they informed that non-compliance was primarily occurred due to shortage of qualified Company Secretary.
2	Regulation 7(3) of SEBI (LODR) Regulations, 2015	Compliance Certificate was not signed by Compliance Officer i.e. Company Secretary of the Company.	Due to non-appointment of a qualified Company Secretary as a Compliance Officer, Compliance Certificate for the half year ended 30 th September, 2019 was signed by the Chairman of the Company.



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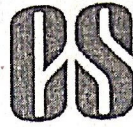
3.	Regulation 14 of SEBI (LODR) Regulations, 2015	Non-payment of Listing fees within prescribed time - limit.	The Company Officials informed that due to financial problem, the Company has paid listing fees to both the Stock Exchanges after prescribed time.
4.	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Non selection of appropriate category in XBRL filing of Quarterly Corporate Governance Report	During XBRL filing of Quarterly Corporate Governance Report, the Company has not selected appropriate category as per actual market capitalization.
5.	Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018	Non submission of RTA Certificate to the Stock Exchanges	The Company Officials informed that due to unavailability of qualified person, the Company was inadvertently failed to file RTA Certificate to the Stock Exchanges for the Quarter ended 30 th June, 2019.
6.	SEBI Circular No.: SEBI/HO/CFD/DCR1/ CIR/P/2018/85 dated 28 th May, 2018.	Non submission of information to Designated Depository	The Company has not updated online information regarding change in employee (upto two level below the CEO) i.e. appointment of Company Secretary, on portal of designated depository within two working days.

- (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 Board of Directors of the Company in their Board Meeting held on 14.08.2019 has passed Board Resolution regarding voluntary delisting of Security from the Calcutta Stock Exchange Limited. On filing of an application to the Calcutta Stock Exchange Limited, various queries were raised which are still pending to resolve.



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- (d) 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 auditor of the listed entity.
- (e) 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:

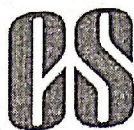
Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any.
1	BSE	Regulation 6(1) of SEBI (LODR) Regulations, 2015: Non-compliance with requirement to appoint a qualified Company Secretary as the Compliance Officer.	The BSE imposed fine for non appointment of a Qualified Company Secretary as the Compliance Officer of the Company.	The fine imposed by the Stock Exchange was paid by the Company. The Board of Directors in their Board Meeting held on 19.03.2020 has appointed a qualified Company Secretary as the Compliance Officer of the Company.
2	SEBI	Regulation 8(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 1997: Non-compliance with requirement of continual disclosure of promoters' shareholding within stipulated time period.	The SEBI imposed penalty for failure to comply with the requirement of continual disclosure made by previous management.	The penalty imposed by the SEBI was paid by the Company and accordingly, the SCN No. EAD-6/AK/VG/ 23314/ 2014/1 dated August 07, 2014 was disposing of by the adjudicating officer.



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- (f) 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	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.	The Company has not submitted Audited Financial Results for quarter and year ended 31 st March, 2018 within 30 minutes of closure of Board Meeting held on 30 th May, 2018.	2018-19	During the review period, the listed entity has taken necessary corrective actions to submit the Results within the prescribed time limit.	The actions taken by the listed entity are satisfactory.

Place: Surat

Date: 30/07/2020



MANISH R. PATEL

Company Secretary

ACS No.: 19885

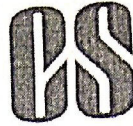
COP No.: 9360

ICSI UDIN: A019885B000527251

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

(Formerly known as Synergy Bizcon Limited)

(CIN: L45201GJ1993PLC114416)

101, Siddh Chambers, Taratiya Hanuman Street,

Gurjar Faliya, Haripura, Surat - 395003,

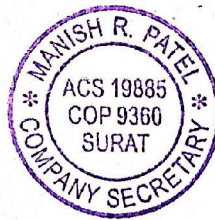
Gujarat, India.

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.

Place: Surat

Date: 30/07/2020



MANISH R. PATEL

Company Secretary

ACS No.: 19885

COP No.: 9360