

30/05/2022

To,  
Corporate Relations Department,  
Bombay Stock Exchange Limited,  
Phiroz Jeejeebhoy Tower,  
Dalal Street, Fort,  
Mumbai – 400 001.

**Reference: Scrip Code: 531083. Scrip ID: NIHARINF**

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Certificate**

Pursuant to Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the SEBI Circular No. CIR/CFD/CMD/27/2019 dated 08/02/2019, the Annual Secretarial Compliance Audit was carried out by M/s. Surya Gupta & Associates, Practicing Company Secretaries, for the financial year ended 31<sup>st</sup> March, 2022 which has been attached for your information and records.

Please take the same on records.

Thanking you,

Yours truly,

**For Nihar Info Global Limited**



**Divyesh Nihar Boda**  
Managing Director  
DIN: 02796318

Encl: As above





**Secretarial Compliance Report  
of  
Nihar Info Global Limited  
For the year ended 31<sup>st</sup> March 2022**

We M/s Surya Gupta & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by M/s NIHAR INFO GLOBAL LIMITED, (CIN: L67120AP1995PLC019200) having its Registered Office at to Nihar House, No.34, Ganesh Nagar, West Marredpally Secunderabad-500026, Telangana, hereinafter referred to as “the listed entity”,
- (b) the filings/ submissions made by the listed entity to the stock exchanges\*
- (c) Website of the listed entity. **The website of the Company is to be updated with the financials for the latest quarter.**
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification for the year ended 31.03.2022 (“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 (Prohibition of Insider Trading) Regulations, 2015;
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable to the Company during the financial year**
- (d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

**Chamber No. 11, Basement, Saraswati Bhawan, ¼, Lalita Park, Laxmi Nagar, Delhi-110092**

**Mob: +91 9711848828, 011-43282052**

**Email: [cssuryagupta@gmail.com](mailto:cssuryagupta@gmail.com)**

- (e) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not applicable to the Company during the financial year**
- (f) 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**

and based on the above examination, I/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: -

S. No	Section / Regulation	Provisions	Remarks
1.	Regulation 76 of SEBI (Depository & Participant) Regulations 2018	Every Company whose Securities are listed on a recognized Stock Exchange shall within 30 days of end of quarter submit share reconciliation Audit report to the Stock Exchange	There was a delay in filing of the said Report for the quarter ending September 30,2021 as the same was filed by the Company on 25th day of November,2021
2.	Regulation 40(9) of SEBI (Listing Obligation & Disclosure Requirement) Regulations, 2015	Every Listed entity shall obtain a certificate from a Company Secretary in Practice on a half yearly and file the same with the stock exchanges within 30 days of end of each half year	There was a delay in filing of the certificate for the half year ended 30th September, 2021.
3.	Regulation 27(2) of SEBI (Listing & Disclosure Requirements) Regulations,2015	Every Listed entity is required to file with the stock exchange, A corporate Governance report within 21 days of end of quarter	There was a delay in filing the report for the quarter ending June 30,2021 and the same was filed on 4th day of August,2021
4	Payment of Annual Listing Fee to Stock exchanges.	Every Listed entity shall pay annual listing fee as per the listing agreement within the Prescribed period	There was a delay in payment of the same by the Company and an E-mail was received from BSE dated 02nd November, 2021.

(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 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
1	Bombay Stock exchange	Failure to pay the Annual listing fee for the financial year 2021-22 within the prescribed time period.	NIL	The Company received an E-mail from BSE dated 02.11.2021 and the listing fee was subsequently Paid.

(d) 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	Observations made in the secretarial compliance report for the year ended ( <i>The years are to be mentioned</i> )	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	-	-	-

\*Quarter 4 financials are to be uploaded

SURYAKA  
NT GUPTA

Digitally signed  
by SURYAKANT  
GUPTA  
Date: 2022.05.30  
17:08:23 +05'30'

Due to COVID -19 pandemic it is very difficult to physically verify all the Documents So based on documents provided by the company in electronic mode we have done our verification virtually and took Management Representation Letter from the Company wherever required.

**For Surya Gupta & Associates,  
Company Secretaries**

**Date: 30.05.2022  
Place: Delhi**

**SURYAKA** Digitally signed  
by SURYAKANT  
**NT** GUPTA  
**GUPTA** Date: 2022.05.30  
17:08:34 +05'30'

**Suryakant Gupta**

**Proprietor**

**M. No.: F9250**

**C.P No.: 10828**

**UDIN: F009250D000427681**

**Peer Review: 907/2020**