



Tinna Rubber And Infrastructure Limited

CIN NO. : L51909DL1987PLC027186

Regd. Office : Tinna House, No-6, Sultanpur, Mandi Road,
Mehrauli, New Delhi -110030 (INDIA)

Tel. : (011) 4951 8530 (70 Lines), (011) 4900 3870 (30 Lines)

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E-mail : tinna.delhi@tinna.in

URL - www.tinna.in

Date: 27th July, 2020

To,
The Manager (Deptt. of Corporate Services)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street , Mumbai-400001.

To,
The Secretary,
Calcutta Stock Exchange Limited
7, Lyons Range,
Kolkata-700001

Ref: Scrip Code: 530475

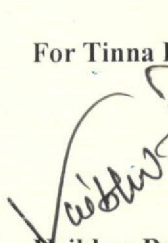
Subject: Annual Compliance Audit Report

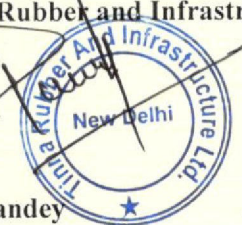
Dear Sir/Ma'am,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 read with clause 3(b) of SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report dated 27th July, 2020 issued by M/s Ajay Baroota & Associates , Practicing company Secretaries for the period ended as on 31st March 2020.

We request you to take the above information on the record

For Tinna Rubber and Infrastructure Limited


Vaibhav Pandey
(Company Secretary)
M. No-A 53653



AJAY BAROOTA & ASSOCIATES

COMPANY SECRETARIES

204, NIDHI PLAZA, PLOT NO. 8, L.S.C., NEAR SHAKTI NAGAR UNDER BRIDGE, DELHI-110052
PHONE : 011-23653555 MOBILE : 9868450041, 9810355223 E-MAIL : baroota@rediffmail.com, baroota_csp@yahoo.co.in

Ajay Baroota

M.Com.,LLB., FCS

Secretarial compliance report of Tinna Rubber And Infrastructure Limited for the year ended 31st March, 2020

I, Ajay Baroota proprietor of Ajay Baroota & Associates, Company Secretaries, having office at 204, Nidhi Plaza, Plot No. 8, LSC near Shakti Nagar Under bridge, Delhi-110052 have examined:

- (a) all the documents and records made available to me and explanation provided by *Tinna Rubber And Infrastructure 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; (Not applicable as no reportable event during the period under review)
- (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 as no reportable event during the period under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable as no reportable event during the period under review)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable as no reportable event during the period under review)



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable as no reportable event during the period under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (j) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not applicable as no reportable event during the period under review)

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 there under, *except*

- Pursuant to regulation 14 of SEBI (LODR), Regulations, 2015 annual listing fee for BSE has been paid in July 2019 & whereas annual listing fee for Calcutta Stock Exchange applicable for the preceding year & for the review period is yet to be paid.
- Pursuant to Regulation 33/47 Financial Results for the quarter ended 31st December, 2019 were considered/approved & submitted to the Stock Exchanges beyond the prescribed due date & fine has been paid by the company in terms of circular No. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018.
- The Annual Report for the financial year 2018-19 does not contain all the disclosures required pursuant to Schedule V of SEBI (LODR), Regulations, 2015.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my 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, if any
		NIL		



(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... (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
1.	annual listing fee for Calcutta Stock Exchange not paid	2018-19	Yet to be paid	Advised the Company to pay
2.	Notice/intimation pursuant to regulation 29 of SEBI ((LODR), Regulations, 2015, for Board Meeting scheduled for 09 th Feb, 2019 where financial results were discussed (for the quarter ended 31 st December, 2018) was given to the Stock Exchange(s) in time on 31 st January, 2019, however Notice pursuant to regulation 47(1) (a) for the same was published on 06 th February, 2019.	2018-19	No Action required	No comments

Place: *Delhi*
Date: *27/07/2020*

For Ajay Baroota & Associates
Company Secretaries



[Signature]
Prop Ajay Baroota
FCS No.: 3495
C P No.: 3945
UDIN: F003495 B000 507812
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