



Secretarial compliance report of
ABHISHEK CORPORATION LIMITED
for the year ended 31st March 2020

We have examined:

- all the documents and records made available to us and explanation provided by **ABHISHEK CORPORATION LIMITED (CIN L51491PN1993PLC073706)** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**Not Applicable to the Company during the Review period**);
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not Applicable to the Company during the Review period**);
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (**Not Applicable to the Company during the Review period**);
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(**Not Applicable to the Company during the Review period**);
- 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 Review period**);
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- other regulations as applicable) and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period:

- 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 30(6) The listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or	Company has not disclosed / disclosed with delay to the stock exchange several events specified in point no. 16 Part A of Schedule III to the SEBI (N.A.



	information as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information. Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay:	LODR) 2015) with reference to Corporate Insolvency Resolution Process	
2.	Reg 14 The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange(s), in the manner specified.	Company has not paid listing fees for the year 2019-20	BSE and NSE have suspended trading due to nonpayment of Annual Listing Fees.

(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 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, if any.
1	BSE Limited	Non Payment of Annual Listing Fees for FY 2019-20	Interest of Rs. 8850 Charged and warning for actions mentioned in SEBI circular LIST/COMP/OPS/ 16 /2019-2020	As informed by the company it is under liquidation hence it has not paid Annual Listing Fees due to paucity of funds.
2	National Stock Exchange of India Limited	Various Non Compliances	Show Cause Notice for delisting of shares due to various non compliances.	NA
3	National Stock Exchange of India Limited	Non Payment of Annual Listing Fees	Warning of delisting and freezing demat account of promoter or promoter group.	As informed by the company it is under liquidation hence it has not paid Annual Listing Fees due to paucity of funds.

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<p>Reg 33(3)(d)</p> <p>Quarterly and year to date audited financial result for the quarter ended March 31, 2018 filed to</p> <p>BSE – on 3rd September 2018 (Delay of 96 Days)</p> <p>AND TO</p> <p>NSE – on 7th September 2018 (Delay of 100 Days)</p>	31 st March 2019	<p>The company has complied the same with delay.</p> <p>Since Company is under Corporate Insolvency Resolution Process various activities and compliances were undergoing. Due to heavy work load in complying with the various procedures under CIRP parallel with routine Corporate Compliance the existing manpower was not sufficient. Due to this the company was not been able to finalize its results on time.</p>	<p>Company has delayed in compliance with the regulation 33(3)(d) for the quarter ended March 31, 2018.</p> <p>As informed to us since the company is under liquidation it has not paid fine imposed by BSE.</p>
2	<p>Reg 33(3)(a)</p> <p>Quarterly unaudited financial result for the quarter ended June 30, 2018 was required to be filed by August 14, 2018. However Company filed the unaudited financial result for the quarter ended September 30, 2018 to BSE AND NSE on 29th September 2018 with delay of 46 Days.</p>	31 st March 2019	<p>The company has complied the same with delay.</p> <p>Since Company is under Corporate Insolvency Resolution Process various activities and compliances were undergoing. Due to heavy work load in complying with the various procedures under CIRP parallel with routine Corporate Compliance the existing manpower was not sufficient. Due to this the company there was delay.</p>	<p>Company has delayed in compliance with the regulation 33(3)(d) for the quarter ended June 30, 2018.</p> <p>As informed to us since the company is under liquidation it has not paid fine imposed by BSE.</p>

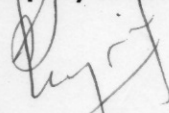


3	<p>Reg 30(6)</p> <p>Order of liquidation passed by NCLT, Mumbai bench dated 11 March, 2019 is filed with the stock exchanges on 14.05.2019. Further Company has not disclosed to the stock exchange several events specified in point no. 16 Part A of Schedule III to the SEBI (LODR) 2015) with reference to Corporate Insolvency Resolution Process</p>	31st March 2019	<p>Since Company is under Corporate Insolvency Resolution Process various activities and compliances were undergoing. Due to heavy work load in complying with the various procedures under CIRP parallel with routine Corporate Compliance the existing manpower was not sufficient hence few of the events mentioned in Point No. 16 Part A of Schedule III to the SEBI (LODR) 2015 were missed or informed with delay. These lapses were unintentional and without any malafide intention</p>	<p>These were one time compliances which has been skipped or submitted with delay by the company. However at the time of filing the company has not given the explanations for the delay.</p>
4	<p>Reg 33(6)</p> <p>Financial Result for the quarter and year ended on March 31, 2018 which was approved in Board of Directors Meeting held on 03.09.2018 was filed with NSE on 07.09.2018 with delay of 4 days.</p>	31 st March 2019	<p>The company has complied the same with delay.</p> <p>Since Company is under Corporate Insolvency Resolution Process various activities and compliances were undergoing. Due to heavy work load in complying with the various procedures under CIRP parallel with routine Corporate Compliance the existing manpower was not sufficient. Due to this the company there was delay.</p>	<p>Company has delayed in compliance with the regulation 33(6) for the quarter ended March 31, 2018.</p> <p>As informed to us since the company is under liquidation it has not paid fine.</p>



5	Reg 14 The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange(s), in the manner specified.	31st March 2019	Since the Company was under CIRP and already running with liquidity problems Company couldn't pay listing fees for the year 2018-19	As informed to us since the Company is under liquidation hence it has not paid Annual Listing Fees.
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For, PPS & Associates
Company Secretaries



Shrenik Nagaonkar
Partner

FCS No.: 7067 C P No.: 11682
UDIN: F007067B000523211



Place: Kolhapur
Date: July 29, 2020