



VIVEK MISHRA & Co.
A Firm of Company Secretaries

Secretarial compliance report of Nagreeka Capital & Infrastructure Limited

For the year ended 31st March 2022

We-Vivek Mishra & Co. have examined:

- (a) all the documents and records made available to us and explanation provided by **Nagreeka Capital & 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,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, guide lines 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares andTakeovers)Regulations,2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; N.A.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits)Regulations,2014; N.A
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)Regulations,2008; N.A
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible



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- and Redeemable Preference Shares) Regulations, 2013; N.A
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (other regulations as applicable) and circulars/guidelines issued thereunder;

and based on the above examination, 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, 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.	Nil	Nil	Nil

- (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:



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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.	NIL	NIL	NIL	NIL

(a) 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 2021 <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
1.	Non-compliance with the requirements pertaining to the composition of the Board	Pursuant to regulation 17(1) (c) of SEBI LODR Guidelines, top 2000 listed should comprise of not less than 6 (six) Directors. Since Company belongs to the aforesaid category the Board has now re-constituted its Board by appointment more new additional directors to the Board effective from 1st April, 2020.	Re-constituted its Board with 1 executive and 5 non-executive directors with 3 Independent Director out of 6. Beside this NSE has waived off the fine imposed for non-compliance with Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) 2015	Listed Entity has Re-constituted the composition of Board as per regulation 17(1).



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2.	Non-disclosure of relationships between directors inter-se;	Details of disclosure as required under LODR regulations has not been disclosed in AGM notice.	Listed entity could not corrected AGM notice.	Listed entity could not corrected AGM notice since this already dispatched and that observation still continued as already mentioned in Previous report.

For Vivek Mishra & Co.
Company Secretaries

CS Vivek Mishra | Partner
Membership No. FCS-8540
COP:17218
Udin: F008540D000386181 dated 25.05.2022
Peer Review: 1720/2022

Place: Kolkata