



## CHHATISGARH INVESTMENTS LIMITED

Registered Office : 73-A, Central Avenue, NAGPUR 440018 (M.S.)

Corporate Office & Correspondence Address :

Vanijya Bhawan, 2nd Floor, Sai Nagar, Devendra Nagar Road, RAIPUR 492001 (C.G.)

E-mail : cil\_rpr@rediffmail.com Website : www.cginvest.co.in

PAN No. : AAACC9266D - CIN : L67120MH1982PLC331831 - GSTNo. : 22AAACC9266D1ZY

27<sup>th</sup> May, 2022

To,  
The Calcutta Stock Exchange Ltd.  
7, Lyons Range  
Kolkata – 700001

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022

Please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022, issued by M/s. B.R. Agrawal & Associates, Practicing Company Secretaries, u/r 24A of SEBI (Listing Obligations & Disclosure Requirements), Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and records.

Thanking you

Yours faithfully,  
For Chhatisgarh Investments Ltd.

  
Company Secretary

Encl: As above





**SECRETARIAL COMPLIANCE REPORT OF**  
**CHHATISGARH INVESTMENTS LIMITED**  
(CIN: L67120MH1982PLC331831)  
(FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH 2022)

I have examined:

- (a) All the documents and records made available to me and explanation provided by **Chhatisgarh Investments Limited (CIN: L67120MH1982PLC331831)** (hereinafter called 'the Company') ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) Such other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on **31<sup>st</sup> 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, 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 following regulations and guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'), has been examined, include:-

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulation 2015;
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992;
- (d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;



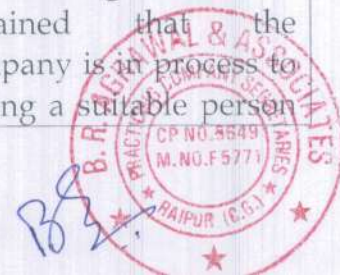


(e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996;

And based on the above examinations, 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 the guidelines including specific clause)	Deviations	Observations/ Remarks of Practicing Company Secretary
1.	As per Regulation 31(2) of LODR, hundred percent of shareholding of promoter(s) and promoter group in dematerialized form.	150 shares held by one shareholder belonging to promoter group not in dematerialized form.	<p>The promoters were required to maintain their shareholding in dematerialized form but the same has not been complied with.</p> <p>The management has explained that 150 shares held by one shareholder being minor, belonging to promoter group not in dematerialized form due to some technical issues the promoters are taking necessary steps for getting the shares dematerialized.</p>
2.	Composition of Board of Directors with respect to Independent Director as specified under Regulation 17(1)(b) of SEBI (Listing Obligations and Disclosure Requirement) Regulation, 2015.	The Listed Entity has not appointed sufficient number of Independent Directors.	<p>After appointment of one Non-Executive Director from Promoters group on 01/01/2022 and since the Chairman of the Board also belongs to the Promoters group, therefore, the Company was required to appoint one Independent director by 31/03/2022.</p> <p>The management has explained that the Company is in process to finding a suitable person</p>





			with a profile relevant to the business of the Company for appointment as Independent Director.
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(b) Further, the listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.

(c) The following are the detail of action taken against the listed entity by SEBI under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder : NIL

Sr.	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letter, Practicing debarment, etc.	Observations/re mark of the Practicing Company Secretary, if any
	NIL	NIL	NIL	NIL

(d) The listed entity has taken the following action to comply with the observation made in previous reports:

Sr.	Observations of the Practicing Company Secretary in the previous report	Observations made in the secretarial Compliance report for the year ended 2021	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	As per Regulation 44 of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 the Company was required to provide E-voting facility to its shareholders;  The Company has not provided the E-voting facility to its shareholder for the Annual	The Company was required to provide E-voting facility to its shareholders but the same has not been complied with.  The management explained that though the Company is a listed Company but it has only twenty shareholders,	The Company has provided E-voting facility to its shareholders for General Meetings held in the year 2021-22.	The Company has duly complied with the provisions of regulation 44 of SEBI (LODR) Regulations.





	General Meeting.	therefore the same was not economical /feasible. It was considered that the intent of e-voting is to ensure better participation of members of the Company which was otherwise available.		
2.	As per Regulation 31(2) of LODR, hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form.  1000 shares of Promoters group held by two promoters are not in dematerialized form.	The promoters were required to maintain their shareholding in dematerialized form but the same has not been complied with.  The management has explained that the promoters are taking necessary steps for getting the shares dematerialized.	Out of 1000 shares 850 shares has been dematerialised.	Out of previously reported 1000 shares 850 shares have been dematerialised. 150 shares held by one of the shareholders being minor, belonging to promoter group not in dematerialized form due to some technical issues.  The management has explained that the promoters are taking necessary steps for getting the shares dematerialized.
3.	As per the Regulation 47 (1) (d) of SEBI (Listing Obligations and Disclosure Requirement) Regulation 2015 the Company was	The Company was required to publish the Notice of AGM in Newspaper and the same has not been complied with.	The Company has published in newspaper the Notices required to be given to shareholders by newspaper advertisements in the year 2021-	The Company has complied with the Regulation 47(1)(d) of SEBI (LODR) Regulations





<p>required to publish notices in the Newspaper.</p> <p>The Company has not published the same; however the same has been sent to all the Shareholders individually vide Hand delivery and Email.</p>	<p>The management explained that though the Company is a listed Company but it has only Twenty shareholders, therefore it was economical to provide notice to all the shareholders either by hand delivery or by emails, instead of Publishing.</p>	<p>22.</p>	
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For, B.R. Agrawal & Associates

*Brajesh R. Agrawal*



(CS Brajesh R. Agrawal)  
Practicing Company Secretary  
FCS no: 5771 | C.P. No.: 5649

UDIN: F005771D000407953  
PR No. 553/2017

Date: 27/05/2022  
Place: Raipur

*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.*



To,  
The Members  
Chhatisgarh Investments Limited  
Nagpur (M.H.) -440018.

Our Secretarial Compliance Report for the financial year 31<sup>st</sup> March 2022 is to be read along with this letter.

**Management Responsibility**

1. It is the responsibility of the Management of the Company to maintain all records, devise proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively.

**Auditors Responsibility**

1. Our responsibility is to express an opinion on these records, standards and procedures followed by the Company with respect to applicable compliances.
2. I believe that audit evidence and information obtained from the Company management is adequate and appropriate for me to provide a basis for my opinion.
3. Whenever required we have obtained the managements representation about the compliance of laws, rules and regulations and happenings of events etc.

**Disclaimer**

1. The secretarial Compliance report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For, B.R. Agrawal & Associates

*Brajesh R. Agrawal*

(CS Brajesh R. Agrawal)  
Practicing Company Secretary  
FCS no: 5771 | C.P. No.: 5649



UDIN: F005771D000407953  
PR No. 553/2017

Date: 27/05/2022  
Place: Raipur