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Annual Secretarial Compliance Report of JBM Auto Limited
for the Financial year ended 31st March 2022

(In Compliance with Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015)

To,
JBM Auto Limited
Regd. Office: 601, Hemkunt Chambers,
89, Nehru Place, New Delhi -110019

We have examined (Due to Covid-19 pandemic impact, the required documents were obtained in electronic mode and accordingly verification was done) the following:

- (a) all the documents and records made available to us and explanation provided by M/s JBM Auto 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, 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; (**No event took place under this Regulation during the Audit period**).
- (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; (**No event took place under this Regulation during the Audit period**).



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 till 12th August 2021 and thereafter Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **(No event took place under this Regulation during the Audit period).**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the company during Audit Period).**
- (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 Audit Period).**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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, 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
---Not Applicable---			

- (a) 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 our examination of those records.
- (b) From the examination of the records of the listed entity and website of stock exchanges and information received from the listed entity, there are no 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 there under.




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
Not Applicable				

(c) During the previous year financial year 2020-21, there were some observations in the report. As to the observations, the listed entity has already taken the corrective action as detailed hereunder:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Payment of Listing fee to Stock Exchanges as per Regulation 14 of the SEBI (LODR) Regulations, 2015	Late payment of listing fee to BSE & NSE	The corrective action had been taken by the company as the Listing fee was paid to BSE & NSE on 7 th September, 2020.
2.	Chapter IV – Reg. – 30(6) read with clause 4 sub-clause (a) & (h) of Part A of Schedule III of the SEBI (LODR) Regulations, 2015	Late reporting of the Outcome of the Board meeting held on 30 th June, 2020	The corrective action had been taken by the company as it had reported the Outcome of the Board Meeting with slight delay due to internet connectivity issue..
3.	Sub Clause 2 of Clause 4 of Schedule B of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Late intimation of closure of Trading Window to Stock exchanges (BSE/NSE).	The corrective action had been taken by the company as it had intimated to stock exchanges for closure of Trading Window of the Company on 4 th July 2020.

For Dhananjay Shukla & Associates
Company Secretaries


Dhananjay Shukla
Proprietor
FCS-5886, CP No. 8271
UDIN:F005886D000420828



Date: 30th May 2022
Place: Gudurugram