



AJOONI BIOTECH LIMITED

Regd. Office: D-118, Industrial Area, Phase VII, Mohali-160055 (Pb.)

Phone: 0172-5020758-69 Website: www.ajoonibiotech.com

E-mail: ajooni.biotech@gmail.com / info@ajoonibiotech.com

CIN: L85190PB2010PLC040162

Date: 30/05/2023

To,
National Stock Exchange of India Ltd
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E)
Mumbai - 400051

Symbol: AJOONI

SUBJECT: Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015 for the year ended March 31,2023.

Dear Sir/Ma'am,

In accordance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2023, issued by Mr. MAST RAM CHECHI, Practicing Company Secretary. This is for your information and record please.

You are requested to kindly take the same on record.

Thanking you,

Yours truly,

For AJOONI BIOTECH LIMITED

JASJOT SINGH Digitally signed
by JASJOT SINGH
Date: 2023.05.30
21:18:51 +05'30'

JASJOT SINGH
MANAGING DIRECTOR
DIN: 01937631

M.R. Chechi & Associates

COMPANY SECRETARIES

Mast Ram
M.A. (Eco) MIR & PM, DIR & PM.
DME, DMSM, FCS, Practicing Company Secretary

SCO 35, 1st Floor,
Sector 20-C, Chandigarh – 160020.
Contact: 94172-64876; 0172-4347638.
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Secretarial Compliance Report of M/s. Ajooni Biotech Limited for the financial year ended 31st March, 2023

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s. Ajooni Biotech Limited (hereinafter referred as 'the listed entity'), having its registered office at D-118, Industrial Area, Phase-7, Mohali, Punjab-160059 and Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, Mast Ram Chechi, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Ajooni Biotech Limited (CIN: L85190PB2010PLC040162) ("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 report, for the financial year ended 31st March, 2023 ("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");



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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 and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Based on the above examination, I/We hereby report that, during the Review Period:

- i. (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:

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular Number	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Submission of disclosures of related party transactions.	Regulation 23 of (SEBI) (LODR) Regulations, 2015.	Non-submission of disclosure of related party transactions for the half year ended 31 st March, 2022 within fifteen days from the date of	Stock Exchange.	Fine.	Non-submission of disclosure of related party transactions for the half year ended 31 st March, 2022 within fifteen days from the date of publication of financial	Rs. 17,700/-	The disclosure of related party transactions for the half year ended 31 st March, 2022 was made within 15 days from the date of publication of financial	The company has always been meticulous in compliance with the SEBI Regulations of Companies Act, 2013.	Nil.



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									as advised by the stock exchange on 27 th May, 2022 the disclosure of the related party transactions was filed in pdf format on the same day i.e. 27 th May, 2022. Further the fine imposed on the company has been paid.
2.	Submission of information in Corporate Governance Report for the quarter ended 30 th September, 2022 with respect to Chairman of committees of Board.	Regulation 27, 18(1), 19(2) and 20(2) of (SEBI) (LODR) Regulations, 2015.	Non-submission of details of Chairperson of the committees of the Board in the Corporate Governance Report submitted for the	Stock Exchange of India.	Fine.	Non-submission of details of Chairperson of the committees of the Board in the Corporate Governance Report submitted for the quarter	Rs. 6,51,360	The details of the Chairperson of the committees of the Board submitted under the head "detail of composition of committees" in the Corporate Governance Report	It is hereby clarified that inadvertent ly the option "Member" was selected under the head "Chairperson/Membership" in the



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			<p>quarter ended 30th September, 2022.</p>		<p>ended 30th September, 2022.</p>		<p>submitted for the quarter ended 30th September, 2022.</p>	<p>detail of composition of committees formed by the company in the Corporate Governance Report submitted by the company for the quarter ended 30th June, 2022. Further there was no change in the composition of the committees during the financial year under review. Hence, after the continuous follow up by the company the orders for reversal of fine were issued by the</p>
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									stock exchange.	
3.	Submission of unaudited financial results for the quarter and half year ended 30 th September, 2022.	Regulation 27 of (SEBI) (LODR) Regulations, 2015.	Non-submission of statement of cash flows along with unaudited financial results for the quarter and half year ended 30 th September, 2022.	Stock Exchange.	Fine.	Non-submission of statement of cash flows along with unaudited financial results for the quarter and half year ended 30 th September, 2022.	Rs. 1,71,100	The company had not submitted the statement of cash flows along with unaudited financial results for the quarter and half year ended 30 th September, 2022 which were submitted on 11 th November, 2022.	The company had not submitted the statement of cash flows along with unaudited financial results for the Quarter and Half Year ended 30 th September, 2022 within the prescribed time i.e. on 11 th November 2022 in both pdf and XBRL format. However, due to an inadvertent mistake the Cash Flow Statement could not be attached with the pdf file which was uploaded on the website of the stock	Nil.



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									exchange. This came to the notice of the company on receipt of an email from stock exchange on 12 th December, 2022 and the manageme nt immediately submitted the Cash Flow Statement in pdf format with the stock exchange. Further the company has applied for waiver of fine with the stock exchange and the decision on same is pending.
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular Number	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Submission of continual disclosures under Regulation 7(2)(b) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Regulation 7(2)(b) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	The intimation regarding continual disclosures was filed with the Stock Exchange after two trading days.	Stock Exchange.	Advisory.	The intimation regarding continual disclosures was filed with the Stock Exchange after two trading days.	Nil.	The company had filed the continual disclosure as specified under Regulation 7(2)(b) of SEBI (Prohibition of Insider Trading) Regulations, 2015 within two trading days from the date when the shares were credited in their account of acquirers instead of within two trading days of receipt of intimation of acquisition/ disposal of shares.	It is clarified that the disclosure was filed within two trading days of acquisition of shares (i.e. the effective date of shares to be traded) instead of within two trading days of receipt of disclosure from acquirers becoming aware of such information. However, the company has noted the Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations,	Nil.



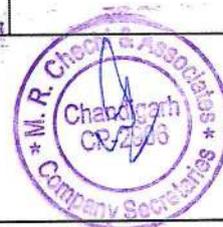
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			of the company during the financial year under review.
	<p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt</p>		



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	<p>of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 th October, 2019.	Not Applicable.	There was no change in the statutory auditors of the company during the financial year under review.

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*



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III. I/we hereby report that, during the review period the compliance status of the listed entity is appended asbelow :

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	Nil
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. ● All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes	Nil
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● The Listed entity is maintaining a functional website. ● Timely dissemination of the documents/information under a separate section on the website. ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to 	Yes	Nil



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	the relevant document(s)/section of the website.		
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	Nil
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	Not Applicable	The company has no material subsidiary.
6.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	Nil
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	Nil
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently</p>	Yes	Nil



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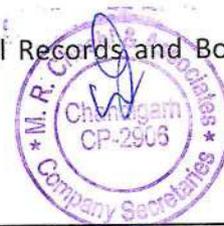
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	approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Nil
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	Yes	The actions taken by SEBI or Stock Exchange(s) against the company are provided in separate paragraph 1(a)(**) of this report.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Nil

Assumptions and limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of



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Accounts of the listed entity.

4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



PR No.: 941/2020
Place: Chandigarh
Date: 30/05/2023
UDIN: F003823E000429336.

M.R. CHECHI & ASSOCIATES
COMPANY SECRETARIES

A handwritten signature in blue ink, appearing to read "M.R. Chechi".

MAST RAM CHECHI, FCS
COMPANY SECRETARY IN PRACTICE
M. NO.: F3823; C.P. NO.: 2906

