

# 306, 3rd Floor, May Fair Gardens,  
Banjara Hills, Road No. 12,  
Hyderabad-500 034, (P) +91-40-35167744  
E-mail: [gradienteinfoitd@gmail.com](mailto:gradienteinfoitd@gmail.com),  
[shareholder@gradientinfotainment.com](mailto:shareholder@gradientinfotainment.com)  
URL: [www.gradientinfotainment.com](http://www.gradientinfotainment.com)



To,

Date: 30.05.2022

The Calcutta Stock Exchange Limited 7, Lyons Range, Murgighata, Dalhousie, Kolkata, West Bengal 700001	BSE Limited P. J. Towers, Dalal Street Mumbai – 400001
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Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018**

**Ref: Scrip Code : 10032161 & Scrip Code: 590126**

With reference to the subject cited, please find enclosed Annual Secretarial Compliance Report for the year ended 31.03.2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) (Amendment) Regulations, 2018.

This is for the information and records of the Exchange, please.

Thanking you.

Yours sincerely,  
For Gradiente Infotainment Limited

Vimal Raj Mathur  
Managing Director  
(DIN: 03138072)

Encl. as above



**POOJA BANSAL**  
Practicing Company Secretary  
Membership No. 50458  
COP No. 18524

Flat No. F1, 5th floor, Respect Home,  
Andul Road, Halderpara, Podrah,  
Howrah - 711109  
Email Id- [pujab35@gmail.com](mailto:pujab35@gmail.com)  
Contact No. 9038589527

**SECRETARIAL COMPLIANCE REPORT OF GRADIENTE INFOTAINMENT LIMITED  
FOR THE YEAR ENDED MARCH 31, 2022  
(Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019)**

To,  
**GRADIENTE INFOTAINMENT LIMITED**  
CIN: L74300TG1992PLC014317  
#306, 3RD FLOOR, MAY FAIR GARDENS BANJARA HILLS,  
ROAD NO 12 HYDERABAD - 500034

I, Pooja Bansal, Practicing Company Secretaries, have conducted the Secretarial Compliance Audit for the financial year ended March 31, 2022, of the applicable Securities and Exchange Board of India (the "SEBI") Regulations and the circulars/guidelines issued thereunder, for M/s. GRADIENTE INFOTAINMENT LIMITED (the "Listed Entity"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

- (a) all the documents and records made available to us and explanation provided by 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 March 31, 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;

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– **Not applicable during the Review Period;**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy back of Securities ) Regulations, 2018 - **Not applicable during the Review Period;**

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable during the Review Period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable during the Review Period;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013 - **Not applicable during the Review Period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015; and
- (i) Other applicable regulations and circulars/guidelines issued thereunder;

and based on the above examination, I 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
	None		

- (a) 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 examination of those records.
- (b) 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.
	None			

- (c) The Listed Entity was not required to take any action with regard to compliance with the observations made in previous report as there was no observation in the previous report.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

**POOJA BANSAL** Digitally signed  
by POOJA  
BANSAL  
Date: 2022.05.25  
13:02:14 +05'30'

**POOJA BANSAL**  
Practicing Company Secretary  
Membership No.: 50458  
COP: 18524  
Peer Review No. 1725/2022

**UDIN: A050458D000383441**

**Kolkata, May 25, 2022**