



HAZOORMULTIPROJECTSLIMITED

CIN : L99999MH1992PLC269813

Date: 30th May, 2024

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001

Scrip ID/ Code : HAZOOR/ 532467

Subject : Annual Secretarial Compliance Report of Hazoor Multi Projects Limited for the Financial Year ended 31st March, 2024.

Ref : Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019

Dear Sir/Madam,

As per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024 issued by the Secretarial Auditor of the Company, Mr. Ranjit Binod Kejriwal, Practicing Company Secretary.

You are requested to kindly take the above information on record.

Thanking You,

Yours Faithfully,

For Hazoor Multi Projects Limited

SWAMINATH
CHHOTELAL JAISWAR

Digitally signed by SWAMINATH CHHOTELAL JAISWAR
DN: cn=SWAMINATH CHHOTELAL JAISWAR,
o=HAZOORMULTIPROJECTSLIMITED, ou=HAZOORMULTIPROJECTSLIMITED,
email=swaminath.chhotelal.jaiswar@hazoorproject.com,
serialNumber=1012094647131645265112277661462011048726726,
c=IN

**Swaminath Chhotelal Jaiswar
Company Secretary & Compliance Officer**

Encl: as above



RANJIT KEJRIWAL

Company Secretaries & Registered Valuer (SFA)

**Secretarial compliance report of M/s Hazoor Multi Projects Limited
For the year ended 31.03.2024**

To
The Board of Directors
Hazoor Multi Projects Limited
CIN: L99999MH1992PLC269813
C-45, 4th Floor, Plot 210,
Mittal Tower, C Wing,
Barrister Rajani Patel Marg,
Nariman Point, Mumbai-4000021

Auditor's Responsibility:

Our responsibility is to express an opinion on compliance of these acts, rules, regulations and circulars and maintenance of records based on our audit. We conducted our audit in accordance with the Auditing Standards issued by the Institute of Company Secretaries of India. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about compliance of acts, rules, regulations and circulars and maintenance of records.

An audit state that due to the inherent limitations of an audit including internal, financial and operating controls, there is an unavoidable risk that some material misstatements or material non-compliances may not be detected, even though the audit is properly planned and performed in accordance with standards.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

I, CS Ranjit Binod Kejriwal, have examined the records of M/s Hazoor Multi Projects Limited ("the Company") which comprises:

- (a) All the documents and records made available to us and explanation provided by the Company
- (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 maybe relevant, which has been relied upon to make this certification.

For the year ended 31.03.2024 ("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:-



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- (a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue Of Capital And Disclosure Requirements) Regulations, 2018;
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **the regulation is not applicable during the Financial Year 2023-24;**
- (e) SEBI (Share Based Employee Benefits) Regulations, 2014; **the regulation is not applicable during the Financial Year 2023-24;**
- (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008; **the regulation is not applicable during the Financial Year 2023-24;**
- (g) SEBI (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2021; **the regulation is not applicable during the Financial Year 2023-24;**
- (h) SEBI (Prohibition of Insider Trading) Regulations, 2015 and circulars/guidelines issued thereunder;

And based on the above examination, I /we hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	
2.	<p><u>Adoption and timely updation of the Policies:</u></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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	Yes Yes	
3.	<p><u>Maintenance and disclosures on Website:</u></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 the relevant documents/section of the website. 	Yes Yes Yes	



4.	<u>Disqualification of Director:</u> None of the director of the company are disqualified under Section 164 of Companies Act 2013.	Yes	
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA Yes	The Company has one Wholly Owned Subsidiary Hazoor Infra Projects Private Limited incorporated on 17 th October, 2023.
6.	<u>Preservation of Documents:</u> 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.	Yes	
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.	Yes NA	All the related party transactions are done with prior approval of Audit Committee.
9.	<u>Disclosure of events or information:</u> 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	



10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation 2015.	Yes	Based on the quarterly compliance certificate received from the Compliance Officer, the company has done all the entries in the SDD Software
11	Actions taken by SEBI or Stock Exchange(s) if any: No actions 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.	Yes	
12.	Additional non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	There are no additional non compliances except those which are mentioned below in the table.

(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.	1
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Resignation Letter of Internal Auditor has not been attached in the Outcome of BM.
Action Taken by	-
Type of Action	-
Details of Violation	Resignation Letter of Internal Auditor has not been attached in the Outcome of BM.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company has revised the filing of outcome of board meeting with the stock exchange on 31 st May, 2023 as resignation letter of internal auditor was not attached with the same.
Management Response	The Resignation Letter was erroneously left out in the outcome of board meeting filed with the stock exchange under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.
Remarks	-

SR. NO.	2
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019



Regulations/ Circular No.	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019
Deviations	Statement of Deviation not filed along with the publication of Financial Result.
Action Taken by	-
Type of Action	-
Details of Violation	Statement of Deviation not filed along with the publication of Financial Result.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company has filed the Statement of Deviation before the publication of financial result for the quarter ended March 2023. The statement of deviation was filed on 08/05/2023 whereas financial results were published on 30/05/2023.
Management Response	The management was not aware about the submission of statement of deviation with the filing of financial results, but has filed the same within 45 days of end of the quarter, as the data was readily available.
Remarks	-

SR. NO.	3
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019
Regulations/ Circular No.	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019
Deviations	Statement of Deviation not filed along with the publication of Financial Result.
Action Taken by	-
Type of Action	-
Details of Violation	Statement of Deviation not filed along with the publication of Financial Result.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company has filed the Statement of Deviation after the publication of financial result for the quarter ended June 2023. The statement of deviation was filed on 12/08/2023 whereas financial results were published on 09/08/2023.
Management Response	The management was not aware about the submission of statement of deviation with the filing of financial results, but has filed the same within 45 days of end of the quarter.
Remarks	-

SR. NO.	4
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019
Regulations/ Circular No.	Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/162/2019 dated December 24, 2019
Deviations	Statement of Deviation not filed along with the publication of Financial Result.
Action Taken by	-
Type of Action	-
Details of Violation	Statement of Deviation not filed along with the publication of Financial Result.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company has filed the Statement of Deviation after the publication of financial result for the quarter ended September 2023. The statement of



	deviation was filed on 10/11/2023 whereas financial results were published on 11/11/2023.
Management Response	The management was not aware about the submission of statement of deviation with the filing of financial results, but has filed the same within 45 days of end of the quarter.
Remarks	-

SR. NO.	5
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 39(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 39(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	The company has not submitted information regarding loss of share certificates to the stock exchange within time.
Action Taken by	-
Type of Action	-
Details of Violation	The company has not submitted information regarding loss of share certificates to the stock exchange within time.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The company had received the intimation regarding loss of share certificates on 25/08/2023 whereas the information was submitted to the stock exchange on 28/08/2023. The submission was delayed by a day.
Management Response	The management was informed about the loss of certificate on a Friday, due to non working of office on the weekend; there was a delay in submission of information to the stock exchange.
Remarks	-

SR. NO.	6
Compliance Requirement (Regulations/ circular/guidelines Including specific clause	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Newspaper publication of notice of Extraordinary General Meeting was delayed by 24 hours.
Action Taken by	-
Type of Action	-
Details of Violation	Newspaper publication of notice of Extraordinary General Meeting was delayed by 24 hours.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The notice was submitted to stock exchange on 08/12/2023, however, the publication of the same in newspaper was done on 10/12/2023. The publication was delayed by 24 hours.
Management Response	The management informed that due to some technical issues at printing house, the newspaper advertisement for notice of Extraordinary General Meeting could not be published in due time.
Remarks	-

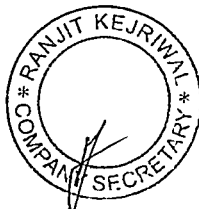
SR. NO.	7
Compliance Requirement (Regulations/ circular/guidelines	SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 and SEBI/HO/DDHS/P/CIR/2021/613 dated April 13, 2022



Including specific clause	
Regulations/ Circular No.	SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 and SEBI/HO/DDHS/P/CIR/2021/613 dated April 13, 2022
Deviations	There was a difference in amount of long-term borrowings disclosed under Initial Disclosure and Audited financial statements for year ended 31/03/2023
Action Taken by	-
Type of Action	-
Details of Violation	There was a difference in amount of long-term borrowings disclosed under Initial Disclosure and Audited financial statements for year ended 31/03/2023
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The amount disclosed in Initial disclosure was 22.72 crores, whereas the amount reported in Audited Financial Statements was 21.87 crores. As per the management it was due to some miscalculation.
Management Response	The management informed that due to some miscalculation, such error had occurred.
Remarks	-

SR. NO.	8
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and BSE Circular number 20230516-36
Regulations/ Circular No.	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and BSE Circular number 20230516-36
Deviations	Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for allotment of securities in XBRL mode was filed after 24 hours of submitting the disclosure in PDF mode.
Action Taken by	-
Type of Action	-
Details of Violation	Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for allotment of securities in XBRL mode was filed after 24 hours of submitting the disclosure in PDF mode.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for allotment of securities in PDF mode was filed on 01/02/2024 and the same was filed in XBRL mode on 03/02/2024.
Management Response	The Management informed that due to technical error in site of stock exchange, the submission was delayed. For compliance, the submission of PDF was enough and filing of XBRL is voluntary.
Remarks	-

SR. NO.	9
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	The company had filed a corrigendum for notice of Extraordinary General Meeting on 29/12/2023, however newspaper advertisement of the same was not published.
Action Taken by	-
Type of Action	-
Details of Violation	The company had filed a corrigendum for notice of Extraordinary General



	Meeting on 29/12/2023, however newspaper advertisement of the same was not published.
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The change in the proposed list of allottees of equity shares was informed via a corrigendum to notice of Extraordinary General Meeting on 29/12/2023, however newspaper advertisement of the same was not published.
Management Response	The Management informed that they had published the initial notice of General meeting but the corrigendum was missed out. However, the corrigendum was sent to the shareholders.
Remarks	-

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

SR. NO.	1
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Mentioned Wrong Score ID
Action Taken by	-
Type of Action	-
Details of Violation	-
Fine Amount	-
Observations/Remarks of the Practicing Company Secretary	The Company has filed the revised Investor Complaints for the Quarter ended 31st December, 2022 within the time prescribed.
Observations made in the secretarial compliance report for the year ended.(the years are to be mentioned)	For the year ended 31-03-2023
Comments of the practicing company secretary on the actions taken by the listed entity.	The Company has filed the revised Investor Complaints for the Quarter ended 31st December, 2022 within the time prescribed.
Remedial actions, if any, taken by the listed entity	-
Management Response	The Management has confirmed that it was a typographical error.
Remarks	-

SR. NO.	2
Compliance Requirement (Regulations/ circular/guidelines Including specific clause)	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Regulations/ Circular No.	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	XBRL Data wrong filing
Action Taken by	-
Type of Action	-
Details of Violation	-
Fine Amount	-
Observations/Remarks of the	The Company has filed the revised XBRL of the Quarter ended 31st December



Practicing Company Secretary	2022 on 29.11.2022.
Observations made in the secretarial compliance report for the year ended.(the years are to be mentioned)	For the year ended 31-03-2023
Comments of the practicing company secretary on the actions taken by the listed entity.	-
Remedial actions, if any, taken by the listed entity	-
Management Response	The Management confirmed that the technical issues arise at the time of filing, so wrong figure were seen on BSE.
Remarks	-

- (c) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. The Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Date: 29/05/2024
Place: Surat



Signature:

Name of PCS: Ranjit Binod Kejriwal

FCS No.: 6116

C P No.: 5985

PR: 12004GJ424500

UDIN: F006116F000482581

This report is to be read with our letter dated 29th May, 2024 which is annexed and forms an integral part of this report.


To
The Board of Directors
Hazoor Multi Projects Limited
CIN: L99999MH1992PLC269813
C-45, 4th Floor, Plot 210,
Mittal Tower, C Wing,
Barrister Rajani Patel Marg,
Nariman Point, Mumbai-400021

Our report dated 29/05/2024 is to be read along with this letter:

1. Compliance with the provisions of SEBI (Listing Obligations and disclosure Requirements) Regulations, 2015 and the SEBI regulations and Circulars is the responsibility of the management of the Company. My responsibility is to express an opinion on these compliances based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the compliance of SEBI LODR, SEBI regulations and SEBI Circulars. The verification was done on test basis to ensure that correct facts are reflected in the compliance records. I believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of SEBI LODR and other SEBI regulations on test basis.
6. The Annual 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.

Date: 29/05/2024
Place: Surat



Signature: 
Name of PCS: Ranjit Binod Kejriwal
FCS No.: 6116
C P No.: 5985
PR: 12004GJ424500
UDIN: F006116F000482581