



RANJIT KEJRIWAL

Company Secretaries & Registered Valuer (SFA)

**Secretarial compliance report of M/s HAZOOR MULTI PROJECTS LIMITED
For the year ended 31.03.2023**

To
The Board of Directors
Hazoor Multi Projects Limited
CIN: L99999MH1992PLC269813
601-A, Ramji House Premises CSL,
30, Jambulwadi, J.S.S. Road,
Mumbai-400002

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 have examined the records of M/s Hazoor Multi Projects Limited ("the Company") which comprises:

- All the documents and records made available to us and explanation provided by the Company
- The fillings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/filing, as maybe relevant, which has been relied upon to make this certification.

For the year ended 31.03.2023 ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
- 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"):



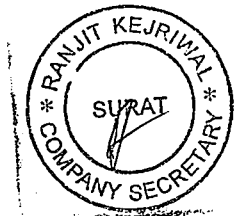
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The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-

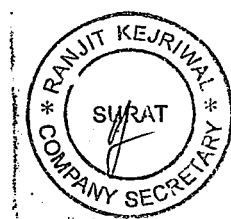
- (a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue Of Capital And Disclosure Requirements) Regulations, 2018;
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **the regulation is not applicable during the Financial Year 2022-23;**
- (e) SEBI (Share Based Employee Benefits) Regulations, 2014; **the regulation is not applicable during the Financial Year 2022-23;**
- (f) SEBI (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2021; **the regulation is not applicable during the Financial Year 2022-23;**
- (g) SEBI (Prohibition of Insider Trading) Regulations, 2015 and circulars/guidelines issued thereunder;
and Circulars/ guidelines issue 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable</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	
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 	Yes	



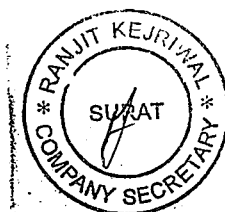
	under Regulation 27(2) are accurate and specific which re-directs to the relevant documents/section of the website.		
4.	<u>Disqualification of Director:</u> None of the director of the company are disqualified under Section 164 of Companies Act 2013.	Yes	
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company doesn't have any Subsidiary Company.
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 Transaction are done with prior approval only.
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 there under.	Yes	



10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulation 2015.</p>	Yes	<p>During the period under review, the company had installed new software and had transferred all the old entries to new software. On the basis of quarterly compliance certificate issued by the Company Secretary all the entries are updated in the software.</p>
11	<p><u>Actions taken by SEBI or Stock Exchange(s) if any:</u></p> <p>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 there under.</p>	Yes	
12.	<p><u>Additional Non Compliances, if any:</u></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>	NA	<p>There are no additional non compliances except those which are mentioned below in the table.</p>

(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: -

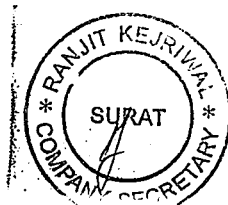
Sr. No.	Compliance Requirement (Regulation)	Regulation/Circular No.	Deviations	Action Taken By	Type of Action (Advisory/CI)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company	Management Response	Remarks



	s/circulars/ guidelines including specific clause)				arificat ion/Fi ne/Sho w Cause Notice /Warni ng, etc)			Secretary		
1	Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requireme nts) Regulations , 2015	13(3)	Ment ioned Wro ng Scor e ID	NIL	NIL	NIL	NIL	The Company has filed the revised Investor Complian tsfor the Quarter ended31st December , 2022 within the time prescribed .	The Managem ent has confirmed that it was a typographic al error.	
2	Regulation 33 of SEBI (Listing Obligations and Disclosure Requireme nts) Regulations , 2015	33	XBR L Data wron g filing	NIL	NIL	NIL	NIL	The Company has filedthe revised XBRL of the Quarter ended 31 st December 2022 on 29.11.202 2.	The Managem ent confirmed that the technical issues arise at the time of filing, so wrong figure were seen on BSE.	

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

Sr. No.	Compl iance Requir ement (Regul ations/ circula rs/guid	Regulatio n/Circular No.	Devi ation	Action Taken by	Type of Action	Details of Violatio n	Fine Amou nt	Observatio ns/Remarks of the Practicing Company Secretary	Managem ent Response	Remar ks



	elines including specific clause)									
1	Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	13(3)	Statement of Investor Complaints for the quarter ended on September 30, 2021	NIL	NIL	NIL	NIL	Complaints Received from the one of the Shareholder through ROC, but not consider in the investor Complaints for the quarter ended on September 30, 2021. However the Complaint was addressed by the Company.	Non-consideration of complaint received in investor complaints was due to negligent and without malafide intentions. However, the company had addressed the complaint and resolved the matter successfully.	

I further report that –

- There was no event of appointment/ re-appointment/ resignation of Statutory Auditors of the Listed Entity during the review period and the Listed Entity has not modified the terms of appointment of its existing Auditor. In this regard, I report that the Listed Entity has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: Surat
Date: 29.05.2023



Signature: *Ranjit Kejriwal*
Name of PCS: Ranjit B. Kejriwal
FCS No.: 6116
C P No.: 5985
UDIN: F006116E000414964
PR: 12004GJ24500

This report is to be read with our letter dated 29th May, 2023 which is annexed and forms an integral part of this report.



RANJIT KEJRIWAL

Company Secretaries & Registered Valuer (SFA)

To
The Board of Directors
Hazoor Multi Projects Limited
CIN: L99999MH1992PLC269813
601-A, Ramji House Premises CSL,
30, Jambulwadi, J.S.S. Road,
Mumbai-400002

Our report dated 29.05.2023 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.

Place: Surat
Date: 29.05.2023



Signature:

Name of PCS: Ranjit Binod Kejriwal

FCS No.: 6116

C P No.: 5985

UDIN: F006116E000414964

PR: 12004GJ24500

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