



# Ahluwalia Contracts (India) Limited

ENGINEERING ♦ DESIGNING ♦ CONSTRUCTION

Date: 02/05/2022

To,

Assistant Manager

Listing Compliance

BSE Limited.

25th Floor, P.J. Towers

Dalal Street, Mumbai - 400001

Asst. Vice President (Listing)

National Stock Exchange of India Ltd.

5th Floor, Exchange Plaza,

Bandra Kurla Complex,

Bandra (East) Mumbai- 400051

**Sub.: Request to review the order for rejection of Waiver of Fine vide Order No. NSE/LIST /SOP/AHLUCONT dated 28-04-2022.**

BSE Scrip Code: 532811 / NSE: AHLUCONT

ISIN Code: INE758C01029

Dear Sir/Madam,

This is reference to your letter through email dated 28-04-2022 vide Ref.: NSE/LIST/SOP/AHLUCONT dated 28-04-2022 on the above mentioned subject for the non-compliance under Regulation 17(1), 17(1)(a), and Regulation 17(1)(b) for non- appointment of Women Director for the period from June 30, 2021 to September 30, 2021.

We would like to submit that during the period from April to June, 2021, the whole Country was witnessing a severe spread of COVID-19 pandemic including in Delhi NCR and Delhi has suffered huge losses of life due to non-availability of Oxygen cylinder and shortage of beds in the Hospitals. Our office was closed as per Order of Delhi Government for the period from March, 2021 to July 2021. Our management was not in a position to discuss this issue with any person for joining the Board as Independent Women Director due to the peak of Covid-19 in Delhi.

However, the Company has appointed Dr. Sheela Bhide, as Independent Women Director w.e.f. 17.09.21, thereby fulfilling both the requirements of appointment of Independent Director and women Director. The delay in complying with the requirements was due to the peak of the pandemic in Delhi NCR.

Further, we wish to submit that the SEBI vide Circular no SEBI/HO/CFD/DILL/CIR/2021/0660 dated 23.11.2021 in partial modification of August 19, 2019 circular, inserted para 9A after para 9,9A, which states that the Stock Exchange Company may deviate from the provisions of the circular, wherever the interest of the investors is not adversely affected, if found necessary, only after recording reasons in writing"

We would like to further draw your attention that the Central Government, State Governments and many regulatory authorities have issued various circulars or notifications for extension and exemptions from filing dates for all Forms, Returns including all other compliances during the period of COVID 19 pandemic situations.

In the instant case, we further wish to submit that the interest of any Investors are not affected due to this and there was no financial impact on any Investors due to this non-compliance. You will appreciate that there is no instance of non-compliances observed for SEBI covered under SOP in the last two years. Keeping in view the above submissions, request your Good office to re-consider the said order and waive the penalty imposed on the Company.

Regards,

Yours faithfully,

For Ahluwalia Contracts (India) Ltd



(Vipin Kumar Tiwari)  
Company Secretary



Registered & Corporate Office: A-177, Okhla Industrial Area, Phase-I, New Delhi-110020

Phone: 011-49410500, 502, 517, & 599, Fax : 011-49410553 E-mail: mail@acilnet.com Website: www.acilnet.com  
(Corporate Identification Number : L45101DL1979PLC009654)