

- CIN No.: L67120AP1994PLC017583
- Corporation Members : NSE (CM+F&O+CDS) & BSE (CM)
- Depository Participant : CDSL
- SEBI : INZ00026734

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

Date: 29.05.2023

Scrip Code: 531672

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report under regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the financial year ended on 31st March, 2024

Please find enclosed herewith Annual Secretarial Compliance Report of the Company issued by M/s. LOYA & SHARIFF, Practicing Company Secretary Mrs. Padma Loya for the financial year ended 31st March, 2024, pursuant to the provisions of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and BSE Circular No. 20230410-41 dated April 10, 2023.

Kindly take the same on your records.

Thanking You,

Yours Faithfully  
For Inani Securities Limited

Lakshmikanth Inani  
Managing Director  
Din: 00461829

**SECRETARIAL COMPLIANCE REPORT**

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

OF

**INANI SECURITIES LIMITED**

**FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> MARCH, 2024**

**1. We, M/s. Loya & Shariff, Practicing Company Secretaries, have examined:**

- (a) All the documents and records made available to us and the explanation provided by **INANI SECURITIES LIMITED**, having its registered office at G-15 Raghav Ratna Towers, 5-8-352/14 & 15, Chirag Ali Lane, Hyderabad- 500001, Telangana, hereinafter referred to as **"the listed entity"** arising from the compliances of specific Regulations listed under **Clause 2** of this report
- (b) The filings or submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity, and
- (d) any other document/ filing or submissions, as may be relevant, on the basis of which this certification is given

**for the year ended 31<sup>st</sup> March, 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 and guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), the Rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI")

**2. 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 and amendments from time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments from time to time; (Not Applicable to the Company during the Audit period)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and amendments from time to time;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 and amendments from time to time; (Not Applicable to the Company during the Audit period)

**Loya & Shariff**

Practicing Company Secretaries

**Hyderabad Office:** C1, 2<sup>nd</sup> Floor, Sumukhi Sahiti Orbit Apts., Madhapur, Hyderabad-500081, Telangana

**Vadodara Office:** A-304, Shashwat Greens, Opp. GERI Compound, Gotri, Vadodara-390021, Gujarat,

Email: [pcscomply@gmail.com](mailto:pcscomply@gmail.com), [loyaandshariff@gmail.com](mailto:loyaandshariff@gmail.com), Ph no. +919687157540, 986612285

**CS Padma Loya**

M.No. 25349 COP 14972

Firm No. P2021TL085300

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 and amendments from time to time; (Not Applicable to the Company during the Audit period)
- (f) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021 and amendments from time to time; (Not Applicable to the Company during the Audit period)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and amendments from time to time;
- (h) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018 and amendments from time to time;

**And based on the above examination, and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India,**

**We hereby report that, during the Review Period;**

- 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 our online examination of those records;
- b. During the period under review, and as per the information provided, there were 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 there under;
- c. During the period under review the Company has complied with the provisions of the Acts, Rules, Regulations, Guidelines, Standards, etc. mentioned above, subject to the following observations:

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Practicing Company Secretaries

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*Padma Loya*  
**CS Padma Loya**  
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p><b>Secretarial Standards:</b></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	NIL
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>● All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes  Yes	NIL  NIL
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>● The Listed entity is maintaining a functional website</li> <li>● Timely dissemination of the documents/ information under a separate section on the website</li> <li>● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</li> </ul>	Yes  Yes  Yes	NIL  NIL  NIL
4.	<p><b>Disqualification of Director:</b></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

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5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries</p>	<p>NA Yes</p>	<p>The company does not have any Material Subsidiary.</p>
6.	<p><b>Preservation of Documents:</b></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>	<p>Yes</p>	<p>NIL</p>
7.	<p><b>Performance Evaluation:</b></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>	<p>Yes</p>	<p>NIL</p>
8.	<p><b>Related Party Transactions:</b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	<p>NA NA</p>	<p>NIL NIL</p>
9.	<p><b>Disclosure of events or information:</b></p> <p>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.</p>	<p>Yes</p>	<p>NIL</p>

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10.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NIL
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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 (**).	No	The Listed entity has complied with all the provisions of the Securities and Exchange Board of India (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and/or its material subsidiary(ies) has/ have complied with paragraph 6.1 and 6.2 of section V-D of Chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	No	NIL
13.	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	NIL

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		

**Loya & Shariff**

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	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	<p>Not Applicable</p> <p>NA</p> <p>NA</p>	<p>Not applicable during the period under review</p> <p>NIL</p> <p>NIL</p>
2.	<b>Other conditions relating to resignation of statutory auditor</b>		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <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</p>	<p>NA</p>	<p>NIL</p>

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	<p>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 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:</p> <p>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 18th October, 2019.	NA	NIL

(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:

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**CS Padma Loya**

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**Practicing Company Secretaries**

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

Sr. No.	Action taken by	Details of Violation	Details of action taken	Observations
The list of observations made in the previous report have been annexed as Annexure A to this report for reference.				

- d. During the period under review, as per the information provided by the Company, there were no instances of the transaction by the designated persons in the securities of the Company during the closure of window.
- e. The listed entity has taken the necessary actions to comply with the observations made in previous reports.

**Assumptions and Limitation of scope of 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 certify based upon 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 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 managements has conducted the affairs of the listed entity.

For and on behalf of  
**LOYA & SHARIFF**  
Practicing Company Secretaries

*Padma Loya*

**CS PADMA LOYA**  
Partner

**M. No. 25349 COP. 14972**

**PR No. 2033/2022**

**UDIN: A025349F000471951**



Place: Hyderabad

Date: 28-05-2024

Hyderabad Office: C1, 2<sup>nd</sup> Floor, Sumukhi Sahiti Orbit Apts., Madhapur, Hyderabad -500 081, Telangana

Vadodara Office: A-304, Shashwat Greens, Opp. GERI Compound, Gotri, Vadodara-390021, Gujarat,

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**Certificate from Company Secretary in Practice**

**In terms of Regulation 34(3) read with Schedule V Para C (10) (i) to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)**

In pursuance of sub clause (i) of clause 10 of Part C of Schedule V of the Securities and Exchange Board of India (SEBI) (**Listing Obligations and Disclosure Requirements) Regulations, 2015**) in respect of **INANI SECURITIES LIMITED** (CIN: L67120AP1994PLC017583) I hereby certify that :

On the basis of the written representation/ declaration received from the Directors and taken on record by the Board of Directors, as on March 31, 2024, none of the directors on the Board of the Company has been debarred or disqualified from being appointed or continuing as director of Companies by the SEBI/Ministry of Corporate Affairs or any such statutory authority.

For and on behalf of  
**LOYA & SHARIFF**  
Practicing Company Secretaries



Place: Hyderabad  
Date: 28.05.2024

*Padma Loya*

**CS PADMA LOYA**  
Partner  
M. No. 25349 COP. 14972  
PR No. 2033/2022  
UDIN: A025349F000471951

**Annexure Forming part of Annual Secretarial Compliance Report**

To,

**INANI SECURITIES LIMITED,**

G-15 Raghav Ratna Towers,  
5-8-352/14 & 15, Chirag Ali Lane,  
Hyderabad- 500001, Telangana

Our Secretarial Compliance Report of even date Issued Under UDIN: **A025349F000471951** is to be read along with this letter.

1. Maintenance of Secretarial records is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the process and practices we followed provide a reasonable basis for our opinion.
3. Wherever required, we have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
4. The Compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards are the responsibility of management. Our examination was limited to the verification of procedure on test basis.
5. As regards the books, papers, forms, reports and returns filed by the company under the above mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timelines of the filing of various forms, reports, returns and documents that need to be filed by the company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

For and on behalf of  
**LOYA & SHARIFF**

Practicing Company Secretaries

*Padma Loya*

**CS PADMA LOYA**

Partner

M. No. 25349 COP. 14972

PR No. 2033/2022

UDIN: A025349F000471951

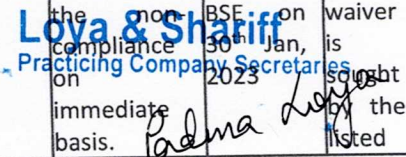


Place: Hyderabad

Date: 28.05.2024

**ANNEXURE A**

Sr. No.	Compliance Requirement (Regulations/circulars/guide-lines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
<b>Penalties levied by BSE:</b>										
1.	As per the Regulation 33 of SEBI (LODR) Regulations, 2015 the listed entity needs to submit quarterly/year to date consolidated financial results	Reg 33 of SEBI (LODR) Regulations, 2015	(Jan 2018 – March 2018 quarter) <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty on the entity.	Fine levied for Rs. 7,771/-	Non-submission of the financial results within the period prescribed under this regulation	Rs. 7,771	The penalty imposed by BSE Ltd on the listed entity should be duly paid and necessary actions must be taken to comply with the non-compliance on immediate basis.	The management has paid the fine and submitted a waiver request application with fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is beyond the prescribed time by BSE and hence waiver is sought by the listed entity. The application is still under process.
2.	As per the Regulation 31 of SEBI (LODR) Regulations, 2015 the listed entity needs to submit the statement of securities held and the shareholding pattern	Reg 31 of SEBI (LODR) Regulations, 2015	(July 2022 – September 2022 quarter) <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty on the entity.	Fine levied for Rs. 33,040/-	Non-submission of the securities held and the shareholding pattern within the period prescribed under this	Rs. 33,040/-	The penalty imposed by BSE Ltd on the listed entity should be duly paid and necessary actions must be taken to comply with the non-compliance on immediate basis.	The management has paid the fine and submitted a waiver request application with fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is beyond the prescribed time by BSE and hence waiver is sought by the listed

  
**Loya & Shatifi**  
 Practicing Company Secretaries

						regulation				entity. The application is still under process.
3.	As per the Regulation 6(1) of SEBI (LODR) Regulations, 2015 the listed entity needs to appoint a qualified Company Secretary as a Compliance Officer	Reg 6(1) of SEBI (LODR) Regulations, 2015	(Jan 2021 – March 2021 quarter)  <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty on the entity.	Fine levied for Rs. 106,200 /-	Non-compliance toward appointment of Company Secretary as a Compliance Officer	Rs. 106,200 /-	The Company Secretary was duly appointed well before the has a duly appointed Company Secretary w.e.f 20 <sup>th</sup> May 2019. Henceforth, the basis of penalty imposed is not justifiable. In spite of the same, the penalty imposed has been duly paid by the listed entity and the waiver is requested for the same.	The Company Secretary was duly appointed well before the penalty action. The management has still paid the fine and submitted a waiver request application with fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is justified by BSE and hence waiver is sought by the listed entity. The application is still under process.
4.	As per the Regulation 6(1) of SEBI (LODR) Regulations, 2015 the listed entity needs to appoint a qualified Company Secretary as a Compliance Officer	Reg 6(1) of SEBI (LODR) Regulations, 2015	(October 2018 – December 2018 quarter)  <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty for the non-compliance on the entity.	Fine levied for Rs. 108,560 /-	Non-compliance toward appointment of Company Secretary as a Compliance Officer	Rs. 108,560 /-	The Company Secretary was duly appointed Company Secretary w.e.f 20 <sup>th</sup> May 2019. Hence, the penalty imposed has been duly paid by the listed entity and the waiver is requested for the same.	The company Secretary was appointed wef 20/05/2019. The management has paid the fine and submitted a waiver request application with fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is beyond the prescribed time by BSE and hence waiver is sought by the

Loya & Shariff  
Practicing Company Secretaries

CS Padma Loya  
M.No. 25349 COP 14972  
Firm No. P2021TL085300

								requested for the same considering the situational reasons for the non-appointment.	on with require fees to BSE on 30 <sup>th</sup> Jan, 2023	listed entity. The application is still under process.
5.	As per the Regulation 6(1) of SEBI (LODR) Regulations, 2015 the listed entity needs to appoint a qualified Company Secretary as a Compliance Officer	Reg 6(1) of SEBI (LODR) Regulations, 2015	(April 2019 - June 2019 quarter)  <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty for the non-compliance on the entity.	Fine levied for Rs. 107,380 0/-	Non-compliance toward appointment of Company Secretary as a Compliance Officer	Rs. 107,380 /-	The Company Secretary was duly appointed Company Secretary w.e.f 20 <sup>th</sup> May 2019. Hence, the penalty imposed has been duly paid by the listed entity and the waiver is requested for the same considering the situational reasons for the delay in appointment.	The company Secretary was appointed w.e.f 20/05/2019. The management has paid the fine and submitted a waiver request application with require fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is beyond the prescribed time by BSE and hence waiver is sought by the listed entity. The application is still under process.
6.	As per the Regulation 34 of SEBI (LODR) Regulations, 2015 the listed entity needs to submit the annual report to Stock exchange	Reg 34 of SEBI (LODR) Regulations, 2015	(April 2021 - March 2022 quarter)  <b>Penalty from Companies - SOP</b>	The BSE Ltd has imposed a penalty on the entity.	Fine levied for Rs. 44,840/-	Non-submission of the annual report to the stock exchange within the period prescribed under this regulation	Rs. 44,840/-	The penalty imposed by BSE Ltd on the listed entity should be duly paid and necessary actions must be taken to comply with the non-compliance on immediate basis.	The management has paid the fine and submitted a waiver request application with require fees to BSE on 30 <sup>th</sup> Jan, 2023	The Penalty imposed is beyond the prescribed time by BSE and hence waiver is sought by the listed entity. The application

**Loya & Shariff**  
Practicing Company Secretaries

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**CS Padma Loya**  
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										tion is still under process.
<b>Penalties levied by NSE:</b>										
1.	Exchange Circular No. NSE/INSP/39393 dated November 13, 2018, requires the Trading Members to upload day-wise Holding Statement in the specified standard format every week.	Exchange Circular No. NSE/INSP/39393 dated November 13, 2018	The violation in terms of Exchange Circular No. NSE/INSP/48655 dated June 18, 2021.	Fine levied	Monetary penalty of Rs.1,00,000/- for the violation pertaining to incorrect data submitted towards weekly holding statement.	The company submitted incorrect data towards weekly holding statement, as on November 30, 2021.	Rs. 1,00,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The data pertaining to the client holding as on November 30, 2021, was submitted on December 08, 2021. However, due to upgradation in the back-office software, the holding of clients for the period from December 01, 2021, to December 06, 2021, got clubbed in the holdings of November 30, 2021. Hence, the same has resulted in mismatch in.	The company has requested for reversal/waiver for the segregation penalty. The application is still under process.

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2.	Exchange Circular No. NSE/INSP/43926, dated March 23, 2020, stipulates that Trading Members upload day-wise Client Level Cash & Cash Equivalent Balances and bank balances of all bank accounts weekly	Exchange Circular No NSE/INSP/48655 dated June 18, 2021.	The violation in terms of Exchange Circular No NSE/INSP/48655 dated June 18, 2021.	Fine levied	Warning for the violation pertaining to incorrect reporting of margin collected from clients. Monetary penalty of Rs. 1,00,000/- for the violation pertaining to incorrect reporting of data towards weekly client-level cash and cash equivalent balances.	The Company has not reported the required data.	Rs. 1,00,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found incorrect and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.
3.	Exchange Circular No. NSE/INSP/38154, dated June 27, 2018, makes it obligatory for the trading Members to collect the initial margin, net buy premium, delivery margin, and exposure	Exchange Circular No. NSE/INSP/42919 dated December 16, 2019	The violation persists in the case of 5 instances involving Rs.0.23 crores as on February 25, 2022, and February 28, 2022.	Fine levied	Monetary penalty of Rs.9,800/- for the violation pertaining to incorrect reporting of margin collected from clients. Warning	The Company has not reported the required data.	Rs.9,800/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found incorrect and hence the penalty is levied. The company

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	margin from respective clients on an upfront basis.				for the violation pertaining to incorrect reporting of data towards weekly client-level cash and cash equivalent balances.					ny is advised to take necessary action to rectify the same. The application is still under process.
4.	Exchange Circular No. NSE/INSP/39393 dated November 13, 2018, required the Trading Members to upload day-wise Holding Statement in the specified standard format every week.	Exchange Circular No. NSE/INSP/39393 dated November 13, 2018.	Incorrect data towards the weekly submission of holding statement, in 195 instances amounting to Rs. 3.12 Crores, for the week ended October 01, 2021.	Fine levied	Monetary penalty of Rs.1,00,000/- for data uploaded by the Member w.r.t Holding Statement on a weekly basis is incorrect.	The Company has not reported the required data.	Rs.1,00,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found to be incorrectly reported and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.

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5.	Exchange Circular No. NSE/INSP/39393 dated November 13, 2018, requires the Trading Members to upload day-wise Holding Statement in the specified standard format every week.	Exchange Circular No. NSE/INSP/45899 dated September 30, 2020	Incorrectly uploaded data in the holding statement on weekly basis as under-Securities reported in excess across 5 dates (Feb 1, 2021, to Feb 6, 2021) in 52 instances, involving Rs. 57.43 lakhs. Limited Purpose Inspection – CM Segment (FY 2021-22) Month of Inspection July 2021 Details of letter of observation (LO) issued to Member NSE/INSP/CM/LPI/21-22/LO/08571, dated July 27, 2021 Reply to the LO issued December 17, 2021 Securities less reported across 5 dates (Feb 1, 2021, to	Fine levied	Monetary penalty of Rs.50,000/- for the violation pertaining to incorrect data uploaded in the weekly holding statement.	The Company has not reported the required data.	Rs.50,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found incorrectly reported and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.
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			Feb 6, 2021) in 375 instances, involving Rs.3.50 crores.							
6.	Exchange Circular No. NSE/INSP/3 9393 dated November 13, 2018, requires the Trading Members to upload day-wise Holding Statement in the specified standard format every week.	Monetary penalty of Rs.50,000/- for the observation pertaining to incorrect data submitted in the weekly holding statement.	The Company has submitted incorrect data in the weekly holding statement in 394 instances involving Rs.3.64 crores as of January 11, 2021, January 12, 2021, January 13, 2021, January 14, 2021, and January 15, 2021.	Fine levied	Monetary penalty of Rs.50,000/- for the observation pertaining to incorrect data submitted in the weekly holding statement.	The Company has not reported the require data.	Rs.50,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found incorrect reported and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.
7.	Exchange Circular No. NSE/INSP/3 3276 dated September 27, 2017, the total available funds i.e., cash and cash equivalents	Exchange Circular No. NSE/INSP/47457 dated February 25, 2021.	The company has mis-used the funds of credit balance clients towards the margin obligation	Fine levied	Monetary penalty of Rs.2,39,100	The Company has not reported the require data.	Rs.2,39,100	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has reported the data, but was found to be incorrect.	The data provided by the company was found incorrect reported and

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	with the stock broker and with the clearing corporation /clearing members should always be equal to or greater than the Clients' funds as per ledger balance.		of debit balance clients as on, and, amounting to and respectively.							hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.
8.	Exchange Circular No. NSE/INSP/43926, dated March 23, 2020, stipulates the Trading Members to report day-wise Client Level Cash & Cash Equivalent Balances and bank balances of all bank accounts on a weekly basis.	Exchange Circular No. NSE/INSP/47457 dated February 25, 2021.	The Company has reported financial ledger balance (clear) B in cash and cash equivalent submission to the exchange by uploading 13 client codes, which are not registered as Clients on the Exchange UCC database involving Rs. 34.10 Lakhs as	Fine levied	1. Monetary Penalty of Rs. 1,00,000/- for the violation pertaining to Improper use of Clients funds. Warning for the violation pertaining to Incorrect data submitted towards weekly Client level Cash & Cash Equivale	The Company has not reported the require data.	Rs. 1,00,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The Company contend ed that they have shifted the old software to new software on April 01, 2022, therefore 13 observed accounts were created due to technical glitch.	The data provided by the company was found incorrectly reported and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The

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			on April 22, 2022.		nt and Bank account Balances and Incorrect data submitted toward the weekly monitoring of client funds.					application is still under process.
9.	Exchange Circular No. NSE/INSP/4 3926, dated March 23, 2020, stipulates the Trading Members to upload day-wise Client Level Cash & Cash Equivalent Balances and bank balances of all bank accounts on a weekly basis.	Circular No. NSE/INSP/53530 dated September 02, 2022	Incorrect bank account balances to the Exchange in the case of 8 instances, involving Rs.4.53 Crores as on September 30, 2022. Incorrect data submitted by HSB towards the weekly monitoring of client funds.	Fine levied	Monetary penalty of Rs.2,00,000/-	The Company has not reported the require data.	Rs.2,00,000/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The Company contend that they have shifted the old software to new software on April 01, 2022, therefore 13 observed accounts were created due to technical glitch.	The data provided by the company was found incorrectly reported and hence the penalty is levied. The company is advised to take necessary action to rectify the same. The application is still under process.

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10.	Circular no.49348 dated 20 August 2021, modified several times vide Circular no. 49640 dated 17 September 2021, Circular no. 49764 dated 29 September 2021, vide Circular no. 50410 dated 25 November 2021, Circular no.50662 dated 17 December 2021	-DO-	The penalties levied for Delayed/ Modified Submissions and Incorrect filing of data	Fine levied	Monetary Penalty of Rs. Rs. 50,15,752/-	The Company has not reported the require data.	Rs. 50,15,752/-	The company is advised to pay the penalty and take necessary actions to comply with the provisions.	The management has delayed in submitting the report and the company has applied for a waiver.	The Company had delayed in submitting the data and there were few instances where modifications were made and reported, hence the penalty is levied. The Company has requested for a waiver of the same through a representation. The application is still under process.
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