

Ref: SEC/SE/84/2024-25 Date: 15th January, 2025

The Manager- Listing

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The National Stock Exchange of India Limited

"Exchange Plaza", Bandra – Kurla Complex, Bandra (EAST), Mumbai – 400051

BSE LimitedCorporate Relationship Department Phiroze Jeejeebhoy Towers,

Dalal Street, Mumbai - 400001

NSE SYMBOL: SENCO

BSE SCRIP CODE: 543936

<u>Sub: Comments of the Board of Directors on fine levied by the Exchanges under Regulation 44(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015</u>

Dear Sir / Madam,

This is with reference to your letter/email received by the Company for delayed compliance under Regulation 44(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the month ended 30th September, 2024.

As advised in your letter, the notice of non-compliance was duly placed before the Board of Directors of the Company at its meeting held on 15th January, 2025. The Board after due analysis and deliberation noted that the delay in compliance was unintentional and for reasons beyond the Company's control. The Board advised the management to ensure timely compliance in the future.

The Board also noted that the Company has paid the relevant fine as levied by BSE Limited & National Stock Exchange of India Limited within the prescribed timeline.

We request you to take the above on record.

Yours sincerely,

For Senco Gold Limited

Mukund Chandak

Company Secretary and Compliance Officer Membership No: A20051



Senco Gold Limited

CIN NO.: L36911WB1994PLC064637 Registered & Corporate Office: "Diamond Prestige", 41A, A.J.C. Bose Road, 10th Floor, Kolkata - 700 017

Phone: 033 4021 5000 / 5004, Fax No.: 033-4021 5025

Email: contactus@sencogold.co.in

Website: www.sencogoldanddiamonds.com









National Stock Exchange Of India Limited

NSE/LIST-SOP/FINES/1186

October 14, 2024

To,
The Company Secretary
Senco Gold Limited
Diamond Prestige, 41A,
A.J.C Bose Road,
10Th Floor, Unit No-1001,
Kolkata-700017

Dear Sir/Madam.

Subject: Notice for non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (hereinafter referred to as "Master Circular"), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with certain Listing Regulation(s). The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure.**

You are requested to inform the Promoters about identified non-compliance and to make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.

You may also file request for waiver of fines with detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

i. Policy on exemption of fine:

https://archives.nseindia.com/content/equities/Policy for exemption SOP Equity.pdf

ii. Policy on processing of waiver application:

 $https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf$

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link:

NEAPS>>Compliance>>Fine Waiver>>Waiver Request.

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Signer: RACHNA JHA Date: Mon, Oct 14, 2024 19:37:54 IST Location: NSE





National Stock Exchange Of India Limited

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

Path: NEAPS > COMPLIANCE > Announcements > Announcements / CA (Subject: Updates)

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Operations Department: -

- Ms. Sonam Yadav
- Ms. Harshita Chaubal
- > Ms. Madhu Kadam
- > Mr. Aniket Raut

Yours faithfully For National Stock Exchange of India Limited

Rachna Jha Manager

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National Stock Exchange Of India Limited

Annexure

Regulation	Month Ended	Fine amount per instance (Rs.)	No. of instance(s)	Fine amonut (Rs.)
44(3)	30-Sep-2024	10000	1	10000
			Total Fine	10000
GST (@18%)				1800
			Total	11800

Notes:

- If the fine amount is paid before receipt of this letter, then inform the Exchange accordingly.
- Further, the Company is also required to mail the payment details to the above-mentioned Exchange officers as and when the payment of SOP fine is initiated by the Company.
- Please update the payment details on below mentioned path: NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

The fine paid as mentioned above will be credited to IPFT as envisaged in the circular.

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Signer: RACHNA JHA Date: Mon, Oct 14, 2024 19:37:54 IST Location: NSE