

# Siddha Ventures Limited

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Phone: +91 33 2242 9199/5335 Fax: +91 33 2242 8667 e-mail: response@siddhaventures.com  
Cin: L67120WB1991PLC053646

**Date: 30.05.2024**

To  
The Department of Corporate Service  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400 001

**BSE Scrip Code-530439**

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2024**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 read with SEBI circular no CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March 2024 issued by M/s Dash M & Associates, Company Secretaries.

Kindly take the above information on records

Thanking You,

Yours faithfully,

For **SIDDHA VENTURES LIMITED**

**NIKITA**  
**AGARWAL**

Digitally signed by  
NIKITA AGARWAL  
Date: 2024.05.30  
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**NIKITA AGARWAL**  
**COMPANY SECRETARY & COMPLIANCE OFFICER**



# DASH M & ASSOCIATES

COMPANY SECRETARIES

(UCN: S2015WB331600)

**SECRETARIAL COMPLIANCE REPORT  
OF  
SIDDHA VENTURES LIMITED  
(CIN - L67120WB1991PLC053646)  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

I have examined:

- (a) all the documents and records made available to us and explanation provided by **SIDDHA VENTURES LIMITED (CIN - L67120WB1991PLC053646)** (“the listed entity”),
- (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 may be relevant, which has been relied upon to make this Report.

for the financial 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, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI;

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

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**Not applicable to the Company during the Review Period**);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not applicable to the Company during the Review Period**);

24, C. R. Avenue, 5th Floor, Dr. M. N. Chatterjee Building, Kolkata - 700 012  
**M:** +91 98365 17171 **E-mail:** csmanojitdash@gmail.com



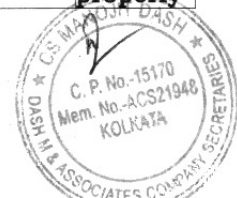
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(**Not applicable to the Company during the Review Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021(**Not applicable to the Company during the Review Period**);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (i) other regulations as applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination, I/We hereby report that, during the Review Period:

- (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 (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Financial Amount	Observations/ Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1	Materiality Policy and Disclosures	Regulation 30(4) of the SEBI (LODR) 2015.	-	-	-	-	-	The listed entity has materiality policy and has disclosed the same in the website. However, in Corporate	Inadvertently overlooked	The management states that the same shall be complied with properly



								Governance Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.		henceforth
2	Authorisation to KMP for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) under this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the listed entity's website.	Regulation 30(5) of the SEBI (LODR) 2015.	-	-	-	-	-	The listed entity has not authorised any KMP	Inadvertently overlooked	The management states that the same shall be complied with properly henceforth



3.	Disclosures of material events	Regulation 30(8) of the SEBI (LODR) 2015.	-	-	-	-	-	The listed entity has not disclosed the material events (Offer given by the subsidiary for subscribing its shares, the rejection of which would reduce the shareholdings in the subsidiary below 50%)	The management has not considered the event as material	The management states that the same shall be looked into.
4.	Familiarisation of Independent Directors	Regulation 25(7) of the SEBI (LODR) 2015.	-	-	-	-	-	The listed entity has a policy for making familiarised its Independent Directors as required under the said Regulation. However, the listed entity has not properly disclosed all the details in its website as required under Regulation 46(2)(i) of the SEBI(LODR) 2015 and also in Corporate Governance	Inadvertently overlooked	The management states that the same shall be complied with properly henceforth



								Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.		
5.	Disclosure by Independent Directors	Regulation 25(8) & (9) of the SEBI (LODR) 2015.	-	-	-	-	-	No disclosure as required under Regulation 25(8) of the SEBI (LODR) 2015 were found and the Board has also not taken note of the same as required under Regulation 25(9) of the SEBI (LODR) 2015	Inadvertently overlooked	The management states that the same shall be complied with properly henceforth

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

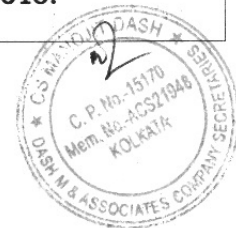
Sr. No.	Observations /Remarks of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended ..... (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation /deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity



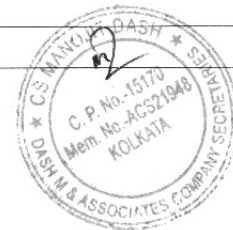
**-NA-**

(j) I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/ No/NA)	Observations/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	<b>No</b>	<b>The listed entity has not fully complied with the provisions of Secretarial Standards issued by The Institute of Company Secretaries of India;</b>
2.	Adoption and timely updation of the Policies:  (a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.  (b) All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI.	<b>Yes</b>	<b>The listed has formulated the policies and disclosed the same on the website. However, the listed entity in its Corporate Governance Report for the Financial Year (FY): 2023-24 under Regulation 27(2), has disclosed that some of the policies are Not Applicable.</b>
3.	Maintenance and disclosures on Website: (a) The listed entity is maintaining a functional website. (b) Timely dissemination of the documents/ information under a	<b>No</b>	<b>The listed entity has not disclosed properly in its Corporate Governance Report for the FY: 2023-24 as required under Regulation 30(4), 30(5) and 30(8) of the SEBI (LODR) 2015.</b>

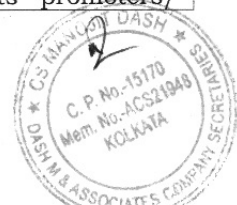


	<p>separate section on the website.</p> <p>(c) Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.</p>		
4.	<p>Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	<b>Yes</b>	
5.	<p>Details related to subsidiaries of listed entities have been examined w. r. t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	<b>NA</b>	<b>The listed entity does not have any material subsidiary</b>
6.	<p>Preservation of Documents: 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>	<b>Yes</b>	
7.	Performance Evaluation:	<b>Yes</b>	

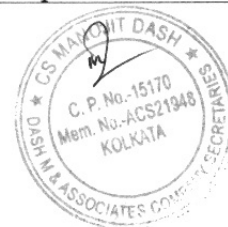




	The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee 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	
9.	Disclosure of events or information: 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.	No	<b>The listed entity has not disclosed about the offer for subscribing the shares of the subsidiary offered to it by the subsidiary on right issue basis.</b>
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	<b>The listed entity has violated the provisions of the Regulations 3(5) &amp; 3(6) the SEBI (Prohibition of Insider Trading) Regulations, 2015 in relation to SDD during the review period. However, the listed entity has gradually made the compliance with respect to the same by end of the 04<sup>th</sup> Quarter ending on 31<sup>st</sup> March, 2024</b>
11.	Actions taken by SEBI or Stock Exchange(s), if any:	-	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
<b>12.</b>	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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.	<b>NA</b>	<b>There was no resignation by the statutory auditors during the review period.</b>
<b>13.</b>	Additional Non-compliances, if any:	-	No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.



Assumptions & limitation of scope and 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 report based upon our 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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 management has conducted the affairs of the listed entity.

Place: **Kolkata**  
Date: **27-05-2024**



For, **Dash M & Associates,**  
*Company Secretaries*

*Manojit Dash*

**MANOJIT DASH**  
**Proprietor**

Membership No.: ACS 21948

C. P. No.: 15170

**UDIN: A021948F000452664**

**PR NO.: 3574/2023**