

Date: 30.05.2022

To,
National Stock Exchange of India,
Exchange Plaza, 8th Floor,
Plot No. C/1, G Block
Bandra Kurla Complex,
Bandra (East), Mumbai – 51

BSE Ltd
Dept. of Corporate Services
P.J. Tower, Dalal Street,
Mumbai – 400 001

Scrip Name: Inventure

Scrip Code: 533506

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March 2022.

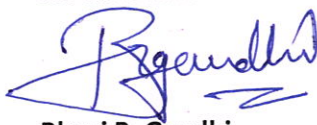
Dear Sir/Madam,

Enclosed herewith the Annual Secretarial Compliance Report issued by M/S D M Zaveri & Co., Company Secretaries for the Financial Year ended 31st March 2022 as per SEBI (Listing Obligation and Disclosure Requirements) Regulation 2015.

Kindly take on your record

Thanking you

For Inventure Growth & Securities Limited



Bhavi R. Gandhi
(Company Secretary)



Secretarial Compliance Report of Inventure Growth and Securities
Limited for the Financial year ended 31 March, 2022

To,
Inventure Growth & Securities Limited

201, 2nd Floor, Viraj Tower, Near
Landmark, Western Express Highway,
Andheri - East Mumbai - 40006.

We, D. M. Zaveri & Co, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Inventure Growth & Securities Limited ("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 certification,

for the year ended 31 March, 2022 ("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 Securities and Exchange Board of India ("SEBI");

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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable 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 during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable during the Review Period)**

D. M. ZAVERI & Co.

Company Secretaries

CS Dharmesh M. Zaveri
B Com., F.C.S.

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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the Review Period)**
(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder;

and based on the above examination, 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 30 read with Schedule III Part A(a)(4)(d) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in filing of Outcome of Board meeting held on 27/08/2021 at NSE which is required to be filed within 30 minutes from the conclusion of such board meeting.	There was delay to comply with Regulation 30 to be read with Schedule III Part A(a)(4)(d), by 3 min. at NSE in filing of outcome of the board meeting, which is required to be submitted with Stock Exchange's within 30 minutes from the conclusion of such board meeting held on 27/08/2021. As represented by the management, there was some technical difficulties faced by the Company for login at NEAPS System of NSE on 27.08.2021 in order to online submission of outcome of said board meeting.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records;

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- (c) Following are the details of 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 thereunder;

Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment etc.	Observations/ remarks of the Practising Company Secretary, if any
1.	SEBI vide its order dated 06/08/2018	Regulation 57(1)&(2) read with clause 2(VII)(G) & (XVI)(B)(2) of Part A of Schedule VIII of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (SEBI (LODR), 2018) Section 12A(a),(b),(c) of the Securities and Exchange Board of India Act, 1992 (SEBI Act, 1992) read with Regulations 3(b),(c),(d), 4(1), 4(2)(k) & (r) of the SEBI (Prohibition of Fraudulent and Unfair Trade Practices	Under section 11, 11(4), & 11B of SEBI Act, 1992 SEBI has passed order dated 6 th August 2018 wherein it has directed that; a. the Company <u>Directors</u> b. Nagji K Rita c. Virendra D Singh d. Kanji B Rita e. Vinod K Shah f. Pravin M Gala g. Arun N Joshi h. Srinivasaiyer Jambunathan i. Harshavardhan M Gajbhiye j. Ajay Khera k. Deepak M Vaishnav l. Arvind Gala (CFO) m. Bhavi Gandhi (CS) shall not access the securities market or buy, sell or otherwise deal in the securities market, either directly or indirectly for a period of 4 years from the date of this order. All the directors as mentioned above shall not associate themselves with any listed company or company proposing to list, or any registered intermediary, in the	<u>Previous report Remark</u> All such non compliances in respect of misutilisation of IPO proceeds and making false and inadequate disclosures in RHP/ Prospectus are pertaining to period earlier than the reporting period of our report. As informed by the management, the Company and all the directors and KMP as mentioned has filed an appeal with Securities Appellate Tribunal (SAT) on 11 th September 2018 against the said SEBI order dated 06/08/2018. SAT from time to time has granted interim stay on reconstitution of the Board as directed in SEBI order dated 06/08/2018. The Company and all the directors and KMP (except Nagji K Rita, Virendra D Singh & Vinod K Shah) had filed an application of settlement in the month of November 2018 with SEBI wherein in the month of January 2019, SEBI has rejected the settlement application filed by Company

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Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment etc.	Observations/ remarks of the Practising Company Secretary, if any
		relating to Securities Market) Regulations, 2003. (SEBI (PFUTP) Regulations, 2003)	capacity of a director, key management personnel or partner (in case of a partnership firm) for a period of 4 years, with effect from January 1, 2019. The Company shall ensure that the board of directors is reconstituted to give effect to the aforesaid directions in order to ensure the smooth functioning of the Company. CFO & CS were warned/ cautioned to exercise due care & diligence, in future. SEBI vide its order dated 9 th August 2018 has allowed the Company from closing their respective open position at the earliest without any further roll-over but fresh positions shall not be allowed to be opened. SEBI has conducted hearing on 25/03/2019 for adjudication proceeding against the Company for the above mentioned matter and the order on the same is awaited.	due to technical reason. Further settlement application filed by such directors and KMP(s) has been withdrawn by them. After several hearings in the matter of order dated 06.08.2018 the final SAT hearings had been completed on 22 nd July 2019. The Hon'ble judges of SAT has passed the Order dated 10.10.2019 and summary of the Order passed was as under: The Appeal filed on 11 th September 2018 by the Company i.e. Inventure Growth & Securities Limited and its directors Mr. Nagji K. Rita, Mr. Virendra D. Singh, Mr. Vinod K Shah, Mr. Kanji B. Rita, Mr. Arvind J Gala and Mrs. Bhavi R Gandhi was partly allowed as follows; The SEBI Order passed against all the Independent Directors i.e. Mr. Ajay Khera, Mr. Deepak Vaishnav, Mr. S. Jambunathan, Mr. H M Gajbhiye, Mr. Arun Joshi and Mr. Pravin Gala has been set aside. The restraint imposed on the Company and Executive

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				<p>Directors was reduced from 4 years to 3 years.</p> <p>The Company, Executive Directors and KMPs had filed Review Applications on 01.11.2019 against the SAT Order dated 10.10.2019. The SAT hearing for Review Applications was completed on 05.02.2020 and order passed as follow;</p> <p>All The review applications has been dismissed and the debarment period has been reduced from 4 years to 3 years.</p> <p>On 24.08.2020 the Company has filed an appeal with Supreme Court and hearing on the same is awaited.</p> <p><u>Current report Remark</u></p> <p>The matter was listed with Supreme Court on 20.05.2022 and Supreme Court directed SEBI to file its counter affidavit to Company's appeal and next hearing is awaited.</p>
2.	SEBI vide its Order dated 30.08.2019	Section 12 A (a), (b), (c) of SEBI Act,1992 and Regulations 3 (b), (c), (d), 4(1), 4(2)(f), (k) and (r) of the SEBI (PFUTP) Regulations	SEBI imposed Penalty as under: 1) The Company- ₹50,00,000/- <u>Directors</u> 2) Nagji K Rita ₹10,00,000/- 3) Virendra D Singh ₹10,00,000/- 4) Kanji B Rita ₹10,00,000/-	<p><u>Previous report Remark</u></p> <p>As informed by the management, the Company and all the Directors and KMP who were penalised has filed an appeal with Securities Appellate Tribunal (SAT) on 4th November 2019 against the said SEBI Adjudication order</p>

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		Regulations 57 (1) and 57 (2) (a) read with Clause 2 (VII) (G) and (XVI) (B) (2) of part A of schedule VIII and 60 (4) of the SEBI (ICDR) Regulations.	5) Vinod K Shah ₹10,00,000/- 6) Pravin M Gala ₹10,00,000/- 7) Arun N Joshi ₹3,00,000/- 8) Srinivasaiyer Jambunathan ₹Rs 3,00,000/- 9) Harshavardhan M Gajbhiye ₹3,00,000/- 10) Ajay Khara ₹3,00,000/- 11) Deepak M Vaishnav ₹3,00,000/- 12) Arvind Gala (CFO) ₹2,00,000/- 13) Bhavi Gandhi (CS) ₹2,00,000/- 1) The Company Directors ₹25,00,000/- 2) Nagji K Rita ₹5,00,000/- 3) Virendra D Singh ₹5,00,000/- 4) Kanji B Rita ₹5,00,000/- 5) Vinod K Shah ₹5,00,000/- 6) Pravin M Gala ₹5,00,000/- 7) Arun N Joshi ₹2,00,000/- 8) Srinivasaiyer Jambunathan ₹2,00,000/- 9) Harshavardhan M Gajbhiye ₹2,00,000/- 10) Ajay Khara ₹2,00,000/- 11) Deepak M Vaishnav ₹2,00,000/- 12) Arvind Gala (CFO) ₹1,00,000/-	dated 30.08.2019. The Hon'ble SAT has granted interim stay on 26.11.2019 for recovery of Penalties levied by SEBI. After several hearings in the matter of order dated 30.08.2019 the final SAT hearings had been completed on 26.02.2020. The Hon'ble judges of SAT has passed the Order dated 26.02.2020 and summary of the order passed was as under: The Hon'ble SAT has instructed Adjudication Officer of SEBI to decide the matter fresh in light of the SAT Order as on 10.10.2019 and set aside the order passed by AO of SEBI. <u>Current report Remark</u> There is no further update on the matter during the period under review.

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			13) Bhavi Gandhi (CS) ₹1,00,000/-	
3.	SEBI vide its Order dated 23.06.2020	Sections 11, 11(4) and 11B read with Section 19 of the SEBI Act, 1992	The Company, Inventure Growth & Securities Limited, prohibited from buying, selling or otherwise dealing in securities in any manner whatsoever, either directly or indirectly, for a period of 02 (Two) years from the date of coming into force of this Order in relation to show cause notice dated April 30, 2015 which was issued after a lapse of 7 years for the alleged trading during the investigation period of 01.06.2008 to 20.12.2008.;	As informed by the management, The Company got restrained for accessing Securities Market for the period of Two years from the date of the Order. <u>Current report Remark</u> The is no change in status.
4.	SEBI email dated 01.07.2020 and 02.07.2020	Sections 11, 11(4) and 11B read with Section 19 of the SEBI Act, 1992	The Company, Inventure Growth & Securities Limited is restrained from accessing security market as an Intermediary as well for a period of Two Years from the date of the Order and issued Directions to immediately Square off the F & O Position of Clients in relation to show cause notice dated April 30, 2015 which was issued after a lapse of 7 years for the alleged trading during the investigation period of 01.06.2008 to 20.12.2008.	As informed by the Management, On receipt of email dtd 01.07.2020 and 02.07.2020, the Company had filed an Appeal at Securities Appellate Tribunal (SAT) against the order and filed Miscellaneous Application for Stay on Order as well as against the directions issued by Assistant Manager of SEBI vide his email dated 01.07.2020 and 02.07.2020. On filing of Appeal, the SAT has passed an Order as on 03.07.2020 as follows: The Hon'ble SAT had find that the appellant i.e. Inventure Growth & Securities Limited

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				<p>has been debarred from accessing the securities market for a period of two years for the trades done in the year 2008, further Hon'ble SAT also found that prima-facie the impugned order only relates to the trading account of the proprietary trading of the appellant and does not relate to the appellant's trading of its client as a registered trading member. At this stage, restraining the appellants in the intermediary trading in the stock market would not be in the interest of the investors nor in the interest of the 2500 shareholders of the appellant company".</p> <p>Hon'ble SAT has granted six week time to the respondent SEBI to file a reply. Three weeks thereafter to the appellant to file a rejoinder and listed this matter for final disposal on 21.09.2020.</p> <p>In the meanwhile, Hon'ble SAT direct that directions issued by the Assistant Manager of SEBI vide his e-mail dated July 1, 2020 and July 2, 2020 will not be acted upon and further make it clear that the restraint order passed by the WTM restraining the appellant from</p>

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				accessing the securities market for two years shall be confined only to the proprietary trading account. The hearing related to matter at Sr. no 3 as well as Sr. No. 4 were listed on various dates and at every such dates the matter was further adjourned to various dates as mentioned below; 21.09.2020, 09.11.2020, 07.12,2020, 22.12.2020, 22.01.2021, 01.03.2021, 16.04.2021, 21.05.2021 14.07.2021, 18.11.2021, 17.12.2021, 19.01.2022, 14.02.2022, 24.03.2022, 28.04.2022 and now matter is listed for hearing on 16.06.2022.
5.	Notice issued by Adj. Officer vide letter No. EAD-7/ADJ/ KS/ AS/ OW/ 3851/ 1/ 2021 dt. 09.02.2021 recd. On 11.02.2021 and SEBI Order dated 23.12.2021	Rule 4 of SEBI (Procedure for Holding Inquiry and imposing penalties) Rules, 1995 read with Section 15-I of the Securities Contracts (Regulation) (Procedure for Holding Inquiry and imposing penalties), Rules 2005 read with	SEBI vide its order dts. 23.12.2021 imposed following penalty under Section 23D of SCRA 1956 and Section 15HA of SEBI Act 1992 and regulation 26(xx) of the Stock Broker Regulations, 1992: 1.section 23D of the SCRA, 1956 : Rs.4,00,000/- (Rupees Four Lakh Only) 2. section 15HB of the SEBI Act, 1992 and regulation 26(xx) of the Stock Broker Regulations, 1992 :	The Company has filed its reply dated 25.05.21 with SEBI and after final hearing SEBI has passed order dated 23/12/2021 by imposing penalty and the same was paid by the Company.

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	passed u/s 15-1 of the of the SEBI Act, 1992 read with the Rule 5 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules,1995 and u/s 23-1 of the Securities Contracts (Regulation) Act, 1956 read with Rule 5 of SCRA.	Section 23-I of the Securities Contracts (Regulation) Act, 1956 for inspection of books of Accounts and other records of the Company for the FY-2014-15	Rs.1,00,000/- (Rupees One Lakh Only)	
6.	Notice from SEBI vide letter No. EFD1/ MIRSD/ ENQ/ DRA2/ 04/ 20-21/ 3613/ 1/ 2021 dt. 27.01.2021 recd. On 15.02.2021	Rule 27(1) of the SEBI (Intermediaries) Regulations, 2008 for conducting enquiry by SEBI	N. A.	The Company has filed its reply dated 31.05.21 with SEBI and final hearing completed on 10.05.2022 and final order is awaited for the same.

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7.	Show cause Notice dt. 04.02.2022 recd. on 11.02.2022 under Rule 4(1) of the SEBI (Procedure for holding inquiry and imposing penalty) Rules, 1995 in the matter of trading activities of certain entities in Index options contracts of NIFTY.	Rule 4(1) of the SEBI Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995	Based on Notice Company has to file reply on Notice stating that why inquiry should not be held against the Company in terms of Rule 4 of the SEBI (Procedure for holding inquiry and imposing penalties) Rules, 1995 read with section 15I of SEBI Act.	The Company has requested to SEBI for inspection of documents and reply from SEBI for the same is awaited.
8.	BSE letter no. L/ DOBS/ SM-275/ IR/ 2021-22/ 572 dt. 24.02.2022	Inspection of Books of Accounts for the period from April 2010 to December 2020 conducted from January 28, 2021 to February 26, 2021.	BSE has levied penalty as under; a) 75000/- for non-settlement of accounts for funds and securities of all clients b) 1000/- for incorrect reporting of Margin Trading Facility (MTF) c) 50000/- for granting further exposures to clients beyond T+2+5 days.	The Company has paid the said penalty.

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			d) 25000/- for inclusion of contravening clauses w.r.t. Tariff sheet. e) 3000/- for reporting incorrect balances under submission of RBS.	

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

Sr. No.	Observation of Practising Company Secretary in previous reports (FY-2019-20)	Observation made in the secretarial compliance report for the year ended 31 March, 2021	Action taken by listed entity if any	Comments of the Practising Company Secretary on the action taken by the listed entity
1.	The Company has submitted copy of annual report with the Stock Exchange on 18-09-2019 after delay of 9 days from the date of dispatch of such report to members i.e. 5th September 2019.	N. A.	NIL	The listed entity has ensured to comply the same in future.
2.	There was a delay of 8 min. in filing of outcome of the board meeting required to be submitted with Stock Exchange within 30 minutes of the closure of such board meeting	N. A.	NIL	The listed entity has ensured to comply the same in future.
3.	--	There was delay to comply with Regulation 30 to be read with Schedule III Part A(a)(4)(h) w.r.t. filing of	NIL	As represented by the management the above referred minor delay occur due to technical difficulties as well

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		Audited Financial Statements of the Company for the year ended 31/03/2020 by 1 min. with BSE and 9 min. with NSE for filing of outcome of the board meeting required to be submitted with Stock Exchange's within 30 minutes from the conclusion of such board meeting held on 15/07/2020.		as connectivity issued faced while uploading results with BSE/ NSE.
4.		There was delay to comply with Regulation 30 to be read with Schedule III Part A(a)(4)(h) w.r.t. filing of un-audited Financial Statements of the Company for the quarter ended 30/06/2020, by 18 hrs and 44 min. at NSE in filing of outcome of the board meeting required to be submitted with Stock Exchange's within 30 minutes from the conclusion of such board meeting held on 12/09/2020.	NIL	As represented by the management, there was some technical difficulties faced by the Company for login at NEAPS System of NSE on 12.09.2020 in order to online submission of outcome of said board meeting, hence in order to avoid any further delay the Company had immediately sent a mail to NSE at 08.23 PM i.e. within 30 min. from the conclusion of said Board Meeting
5.	--	There was a delay of one day to comply with Regulation 31(1)(b) w.r.t. filling of Shareholding pattern for the quarter ended 30.09.2020.	NIL	As represented by the management the above delay occur in view of current pandemic situation and due to work from home situation

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(e) The listed entity has complied with the clause 6(A) and 6(B) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 and that they have incorporated all the terms and conditions in the respective appointment letter issued to the Statutory Auditors;

For D. M. Zaveri & Co.
Company Secretaries

Dharmesh Zaveri

(Proprietor)

FCS. No.: 5418

CP No.: 4363

Place: Mumbai

Date: 30 May 2022

ICSI UDIN: F005418D000423990

Peer Review Certificate No.: 1187/2021