



Date: 30.05.2023

To,
The Listing Department
BSE Limited
The Stock Exchange, Mumbai
PhirozeJeejeebhoy Tower
Dalal Street
Mumbai- 400001

Dear Sir/Madam,

Ref.Scrip Code: 511628

SUB: Annual Secretarial Compliance Report

Sir/Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2023.

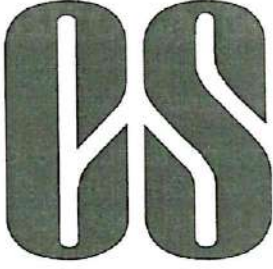
This is for your information and records.

Thanking You
Yours faithfully
For IM+ CAPITALS LIMITED

SAKSHI GOEL
COMPANY SECRETARY & COMPLIANCE OFFICER



Encl: Compliance Report issued by the Practising Company Secretary.



CHETNA BHOLA & ASSOCIATES

Company Secretaries
(A commercial unit of SCS Group)

Off.: D-66, Chhattarpur Enclave I, Delhi – 110074
376/12, Multani Chowk, Hisar, Haryana - 125001

Contact: 011-41675353; +91-7988842449

Email: csshukraa@gmail.com; chetnabhola@gmail.com

May 30, 2023

To
The Board of Directors
IM+ Capitals Limited
72, Ground Floor, World Trade Center
Babar Road, Connaught Place, New Delhi,
Delhi – 110001

SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

We have been engaged by **IM+ Capitals Limited** (CIN: L74140DL1991PLC340407), 72, Ground Floor, World Trade Center, Babar Road, Connaught Place, New Delhi, Delhi – 110001, to conduct an audit and issue Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the company with the provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

The Audit was conducted in accordance with the Guidance Note on Secretarial Compliance Report issued by the Institute of Company Secretaries of India (“ICSI”).

Secretarial Compliance Report is enclosed herewith.

For M/s Chetna Bhola & Associates
Company Secretaries
Peer Review No.: 2573/2022



Chetna Bhola
Partner

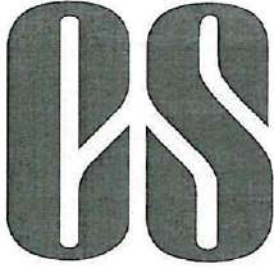
Mem. No.: A41283

C.P. No.: 15802

UDIN: A041283E000387101

Date: May 30, 2023

Place: New Delhi



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SECRETARIAL COMPLIANCE REPORT OF IM+ CAPITALS LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

We have examined:

- all the documents and records made available to us and explanation provided by IM+ Capitals Limited (CIN: L74140DL1991PLC340407), a Company incorporated under Companies Act, 1956 having registered office at 72, Ground Floor, World Trade Center, Babar Road, Connaught Place, New Delhi – 110008 (“the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

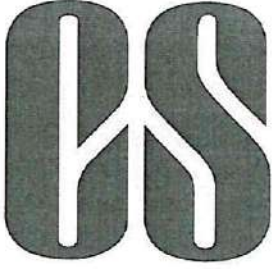
for the year ended March 31, 2023 (“Review Period”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *[Not Applicable as there was no reportable event during the period under review]*
- The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *[Not Applicable as there was no reportable event during the period under review]*
- The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *[Not applicable to the Company during the review period]*





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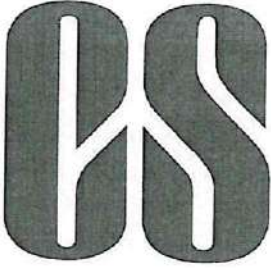
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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *[Not applicable to the Company during the review period]*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;





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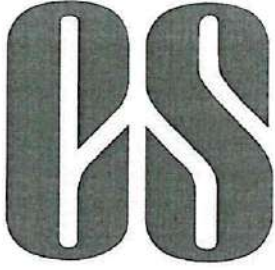
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We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

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 India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	
2.	Adoption and timely Updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/ information under a separate section on the websiteWeb-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	Yes	
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes, none of the Directors are disqualified.	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none">(a) Identification of material subsidiary companies(b) Disclosure requirement of material as well as Other subsidiaries	Yes	
6.	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.	Yes	





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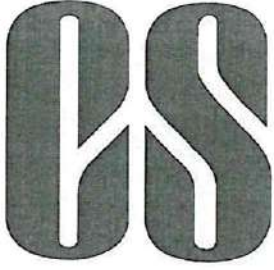
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8.	Related Party Transactions: (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.	Yes N.A.	 No such event reported during the period under review.
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.	Yes	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) &3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
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 except as provided under separate paragraph herein (**).	Yes, except in the matters as stated in this compliance report	
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes, except in the matters as stated in this compliance	





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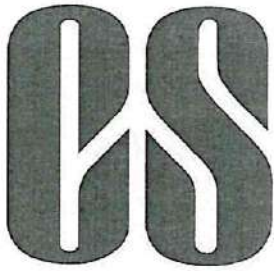
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
		report	

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		
	<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>	N.A.	No such event reported during the period under review.
2.	Other conditions relating to resignation of statutory auditor		





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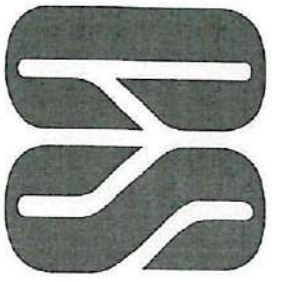
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	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/ material subsidiary such as non-availability of information/non-cooperation 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 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 audit or 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>	N.A.	No such event reported during the period under review.
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.	N.A.	No such event reported during the period under review.





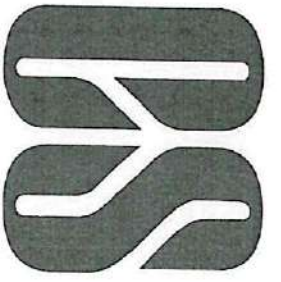
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(a) (***) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
Sr. No.	Compliance Requirement/Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Quarter/ Month	Fine Amount (₹)	Waived Amount (₹)	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
1.	The listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s) within fifteen days from the end of each quarter	Regulation 27(2) of the SEBI (LODR) Regulations, 2015	Delayed submission of Corporate Governance report	BSE	Fine	The listed entity were made delayed submission of Corporate Governance report	For the quarter ended December 31, 2015	1,000	1,000	The Company received a mail on 03 rd February, 2023 for the fine imposed by the exchange related to Corporate Governance Report for the quarter ended December, 2015 and the Company same day made a reply to the stock exchange that the Company has submitted the Report timely on 15.01.2016 and BSE on 06 th February, 2023 replied that As per	--	--



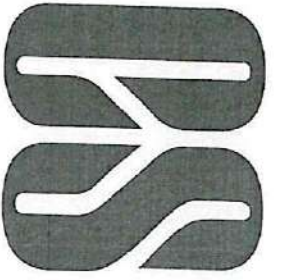


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(1)		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
2.	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five/sixty days of end of each quarter along with limited review report issued by the Statutory Auditors of the Company, other	Regulation 33 of the SEBI (LODR) Regulations, 2015	Delay in submission of the unaudited financial results for the quarter ended March 30, 2018	BSE	Fine	The listed entity were made delayed submission of unaudited financial results for the quarter ended March 31, 2018 in terms of Regulation 33 of the SEBI (LODR) Regulations, 2015	For the quarter ended March 31, 2018	3,60,016	Nil	The Company received a mail on 03 rd February, 2023 for the fine imposed by the exchange related to Financial Results (Regulation 33 of SEBI (LODR) Regulations, 2015 for the quarter ended March, 2018 and the Company same day made a reply to the stock exchange that the	The listed entity had made the payment of Rs. 4,24,819/- (incl. GST) for Regulation 33 Financial Results (March 2018) vide LTR No. IIDFCR52023 02078101546	--	



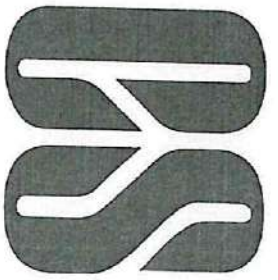


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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	than the last quarter									Company has submitted the Report timely on 30.05.2018 (Acknowledgement attached) and BSE Ltd on 06 th February, 2023 replied that It may be noted that on 30.05.2018 the company had submitted incomplete financial result (newspaper copy) for quarter/year ended March 2018. The complete financial result as per format was submitted on 3 rd August 2018. Hence, fine was levied upto date of submission as per SEBI	2 dated 07.02.2023.	



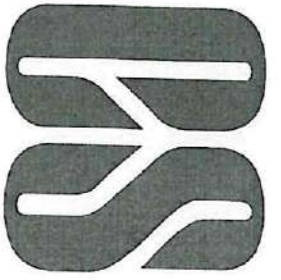


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(1)		(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
3.	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter along with limited review report issued by the Statutory Auditors of the Company, other than the last quarter	Regulation 33 of the SEBI (LODR) Regulations, 2015	Delay in submission of the unaudited financial results for the quarter ended June 30, 2021	BSE	Fine	The listed entity were made delayed submission of unaudited financial results for the quarter ended March 31, 2018 in terms of Regulation 33 of the SEBI (LODR) Regulations, 2015	For the quarter ended June 30, 2021	40,000	Nil	BSE vide email dated 14.09.2021 vide Ref No. SOP-(Review-September-2021) has imposed a fine of Rs. 47,200/- (Rupees Forty-Seven Thousand Two Hundred Only) to be paid by the company within 15 (fifteen) days of date of the said email communication/letter, i.e. September 14, 2021 and The Company has paid the Fine of Rs. 47,200/- (Rupees	In response to the above non-compliance, the Company vide its reply dated September 17, 2021 clarified to the BSE that the Company have submitted the Financial Results for the quarter ended June 30, 2021 of the	--	





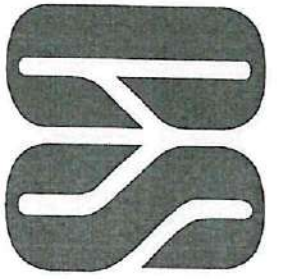
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
										Forty-Seven Thousand Two Hundred Only) on 29.06.2022.	Company on the date of Board meeting i.e. August 12, 2021 and shared a copy of acknowledgment for the said submission. And The Company has paid the Fine of Rs. 47,200/- (Rupees Forty-Seven Thousand Two Hundred Only) on	



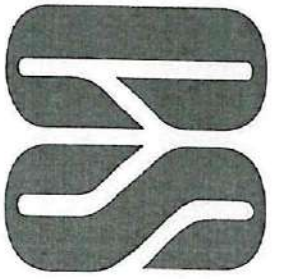


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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
4.	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter along with limited review report issued by the Statutory Auditors of the Company, other than the last quarter	Regulation 33 of the SEBI (LODR) Regulations, 2015	Delay in submission of the unaudited financial results for the quarter ended September 30, 2022	BSE	Fine	The listed entity were made delayed submission of unaudited financial results for the quarter ended September 30, 2022 in terms of Regulation 33 of the SEBI (LODR) Regulations, 2015	For the quarter ended September 30, 2022	5000	--	BSE vide email dated 14.12.2022 vide Ref No. SOP-C-Review-December 2022 has imposed a fine of Rs. 5,900/- (Rupees Five Thousand Nine Hundred Only) inclusive of GST to be paid by the company within 15 (fifteen) days of date of the said email communication/ letter, i.e. December 29, 2022 and The Company has paid the Fine of Rs. 5900/- (Rupees Five Thousand Nine Hundred Only) on 15.12.2022.	The Company has paid the Fine of Rs. 5900/- (Rupees Five Thousand Nine Hundred Only) on 15.12.2022.	--





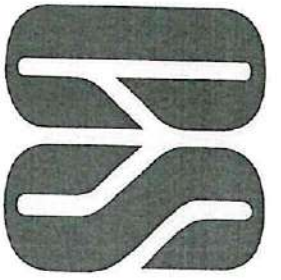
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
5.	The listed entity shall submit to the stock exchange and publish on its website- (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders; (b) in the event of any changes to the annual report, the revised copy along with the details of and explanation for the changes shall be	Regulation 34(1) of the SEBI (LODR) Regulations, 2015	Delay in submission of Annual Report for the financial year ended March 31, 2022	BSE	Fine	The listed entity were made delayed submission of Annual Report for the financial year ended March 31, 2022	For the financial year ended March 31, 2022	2,000	Nil	BSE vide email dated 21.10.2022 vide Ref No. SOP-CReview-(21-Oct-2022) has imposed a fine of Rs. 2360/- (Rupees Two Thousand Three Hundred Sixty Only) inclusive of GST to be paid by the company within 15 (fifteen) days of date of the said email communication/letter, i.e. November 05, 2022 and The Company vide letter dated 31.10.2022 replied that Company is required to send the Annual Report to its shareholders not less than twenty-one days before the Annual General Meeting. We have submitted the Annual Report on BSE on 05 th September, 2022 and the date of the meeting was 29 th September 2022. The	The Company vide letter dated 31.10.2022 replied that Company is required to send the Annual Report to its shareholders not less than twenty-one days before the Annual Meeting. We have submitted the Annual Report on BSE on	--



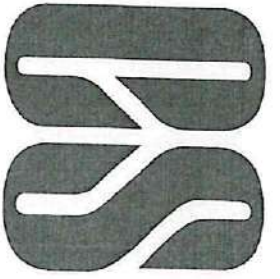


CHEITNA BHOLA & ASSOCIATES
Company Secretaries
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Contact: 011-41675353; +91-7988842449
Email: cshukrae@gmail.com; chetnabhola@gmail.com

(1) Sr. No.	(2) Compliance Requirement/Regulations/ circulars/ guidelines including specific clause)	(3) Regulation/ Circular No.	(4) Deviations	(5) Action Taken by	(6) Type of Action	(7) Details of Violation	(8) Quarter/ Month	(9) Fine Amount (₹)	(10) Waived Amount (₹)	(11) Observations/ Remarks of the Practising Company Secretary	(12) Management response	(13) Remarks
	sent not later than 48 hours after the annual general meeting.									Annual Report was provided to the shareholders alongwith the Notice of Annual General Meeting before the prescribed period (i.e. before 23 days. Copy of Acknowledgement of the submission of Annual Report is enclosed for your reference and the Company has paid the Fine of Rs. 5900/- (Rupees Five Thousand Nine Hundred Only) on 09.11.2022.	September, 2022 and the date of the meeting was 29 th September. The Annual Report was provided to the shareholders alongwith the Notice of Annual Meeting before the prescribed period (i.e. before 23 days. Copy of Acknowledge	





CHEYNA BHOLA & ASSOCIATES

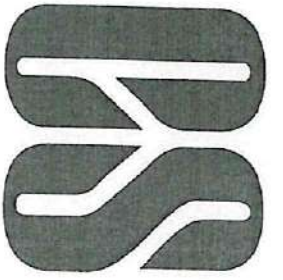
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
6.	The listed entity shall have composition of Board of Directors in terms of Regulation 17 of the SEBI(LODR) Regulations, 2015	Regulation 17(1) of the SEBI(LODR) Regulations, 2015	BSE vide mail dated Fri, Mar 5, 2021 it is observed that as per the latest shareholding pattern report	BSE	Fine	Composition of Board in compliance of Regulation 17(1) of the SEBI (LODR) Regulations, 2015	For the quarter ended December 31, 2020	1,88,800	1,88,800	BSE Limited vide its email dated March 05, 2021 informed the listed entity about non-compliance of the Regulation 17(1) of the SEBI (LODR)	BSE vide mail dated 05 th July 2021 on Tuesday stated that Company's representation	--





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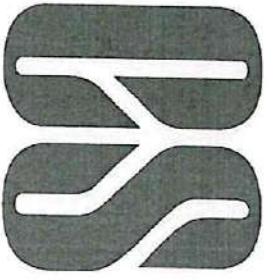
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Sr. No.	Compliance Requirement/Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Quarter/ Month	Fine Amount (₹)	Waived Amount (₹)	Observations/ Remarks of the Practising Company Secretary	Management response	Remarks	
			the promoter name has been included in the list of promoters of the company and also informed that all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid.								Regulations, 2015 and imposed fine of Rs. 1,88,800/- (inclusive GST) and also informed that all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid. In reply of the above, the listed entity sent a communication email to BSE Limited dated March 08, 2021 stating that - "In respect of Regulation 17(1), the Company has fulfilled the composition of Board of Directors and Company has	for waiver of fine was placed before the "Committee for reviewing representation for Waiver of fines levied under Standard operating Procedure (SOP) and pursuant to decision of the committee, request for Waiver has been approved.	



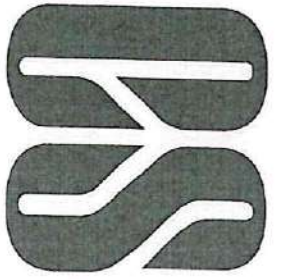


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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
										appointed Ms. Tanya Singhal (DIN: 08930315) as a woman director in the board of IM+CAPITALS LIMITED (Scrip code: 511628) w.e.f. 02.11.2020 in place of Mrs. Richa Mishra (DIN:00405282) who has resigned as a woman director on dated 02.11.2020. Therefore, there question of non-compliance does not arise."		
										BSE vide mail dated 05 th July 2021 on Tuesday stated that Company's representation for		



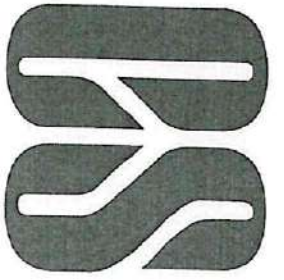


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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
7.	Intimation w.r.t. the appointment of Registrar and share transfer agent	Regulation 7(1) of the SEBI (LODR) Regulations, 2015	Non-compliance of regulation 7(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)	BSE	Fine	Non compliance of regulation 7(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) 2015	For the quarter ended June, 2021	2360	NIL	In response to the above non-compliance, the Company vide its reply dated August 21, 2021 clarified the BSE that there is no change in the Registrar & Share Transfer Agent of the company and the	The Company has paid the Fine of Rs. 2,360/- on 09.11.2022.	--



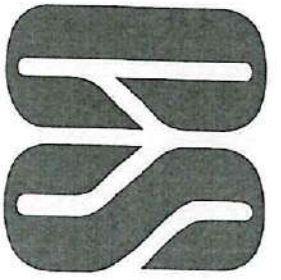
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Sr. No.	Compliance Requirement(Regulations/circulars/ Guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Quarter/ Month	Fine Amount (₹)	Waived Amount (₹)	Observations/Remarks of the Practising Company Secretary	Management response	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
			Regulations, 2015							Company has paid the Fine of Rs. 2,360/- on 09.11.2022.		





CHEITNA BHOLA & ASSOCIATES

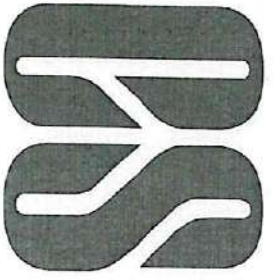
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Regulations/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Quarter / Month	Fine Amount (₹)	Waived Amount (₹)	Observations/ Remarks of the Practising Company Secretary	Management response	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
1.	Disclosures of Events Information	Schedule III- Part A - Disclosures Of Events Or Information - Specified Securities	As per Schedule III-Part A - Disclosures of Events or Information - Specified Securities- The following shall be events/information, upon occurrence of which listed entity shall make disclosure to Stock Exchange(s)- Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary.	--	--	The Company has appointed Ms. Sakshi Goel as Company Secretary on June 30, 2021 and made delayed submission to BSE Limited ("BSE") on July 03, 2021	June 30, 2021	--	--	The Company has appointed Ms. Sakshi Goel as Company Secretary on June 30, 2021 and made delayed submission to BSE on July 03, 2021.	--	--



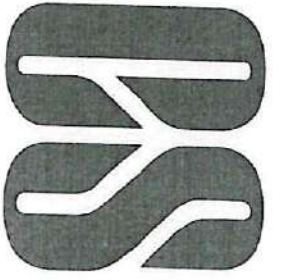


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Sr. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Regulations/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Quarter / Month	Fine Amount (₹)	Waived Amount (₹)	Observations/ Remarks of the Practicing Company Secretary	In response to the above non-compliance, the Company's reply dated August 21, 2021 clarified the BSE that there is no change in the Registrar & Share	Remarks
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
2.	Intimation w.r.t. the appointment of Registrar and share transfer agent	Regulation 7(1) of the SEBI (LODR) Regulations, 2015 BSE Limited ("BSE"), vide Ref No. SOP- Aug-2021)	Non-compliance of regulation 7(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	BSE	Fine	BSE vide email communication dated August 20, 2021 vide Ref.No. SOP- Aug-2021) has imposed a fine of Rs. 2,360/- (Rupees Two Thousand Three Hundred Sixty Only) to be paid by the company within 15 (fifteen) days of date of the said email communication/ letter. i.e.	--	2,360	--	BSE vide email communication dated August 20, 2021 vide Ref No. SOP- (Review-20 Aug-2021) has imposed a fine of Rs.2,360/- (Rupees Two Thousand Three Hundred Sixty Only) to be paid by the company within 15 (fifteen) days of date of the said email communication/ letter, i.e. August 20, 2021 for Non-appointment of Share Transfer Agent. Since, we observed that there was no change in the Registrar & Share	In response to the above non-compliance, the Company's reply dated August 21, 2021 clarified the BSE that there is no change in the Registrar & Share Transfer Agent of the	--





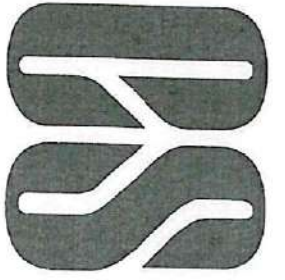
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
3.	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter along with limited review report issued by the Statutory Auditors of the Company, other than	Regulation 33 of the SEBI (LODR) Regulations, 2015	Delay in submission of the unaudited financial results for the quarter ended June 30, 2021	BSE	Fine	BSE vide email dated 14.09.2021 vide RefNo. SOP-(Review-September-2021) has imposed a fine of Rs. 47,200/- (Rupees Forty-Seven Thousand Two Hundred Only) to be paid by the company within 15 (fifteen) days of	For the quarter ended June 30, 2021	47,200	--	In response to the above non-compliance, the Company vide its reply dated September 17, 2021 clarified the BSE that the Company have submitted the Financial Results for the quarter ended June 30, 2021 of the Company on the date of Board meeting itself i.e. August 12, 2021 and shared a copy of acknowledgment for the said submission. The Company had also deposited fine of Rs. 47,200/- as imposed by	--	--
						August 20, 2021 for Non-appointment of Share Transfer Agent.				Transfer Agent and the listed entity in response to the above non-compliance, the Company vide its reply dated August 21, 2021 clarified the BSE that there is no change in the Registrar & Share Transfer Agent.	company	
						The Company had also deposited fine of Rs. 2,360/- as imposed by the BSE on 09.11.2022.						



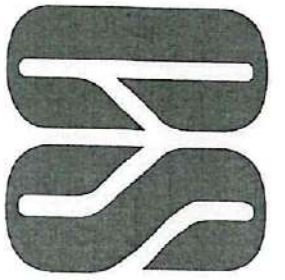


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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
	the last quarter									the BSE on 29.06.2022.		
4.	The listed entity shall submit to the stock exchanges disclosures of related party transactions in every six months in the format as specified by the Board from time to time, and publish the same on its website	Regulation 23(9) of the SEBI (LODR) Regulations, 2015	The company has non-complied /late complied with the Regulation 23(9) for the half year ended September, 2020 and imposed total fine of Rs. 2,30,100/- (Rupees Two Lakh Thirty Thousand One Hundred Only) on the Company.	BSE	Fine	The Company had violated the provisions of Regulation 23(9) of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 with respect to "Non-compliance with disclosure of Related Party Transactions on consolidated basis" against BSE Limited which had levied total fine of Rs. 2,30,100/- (Inclusive GST) on the Company	For the quarter ended September 30, 2020	2,30,100	2,30,100	In reply of the BSE communication, the listed entity sent a communication email to BSE Limited dated 21st January, 2021 stating that – "As per the unaudited Financial Results submitted, Company has not undertaken any related party transactions during the half year ended September 30, 2020. BSE vide mail dated 20th July, 2021 stated that Company's representation for waiver of fine was placed before the "Committee for reviewing representation for Waiver of fines levied under Standard operating Procedure (SOP) and pursuant to decision of the committee, request for	--	--





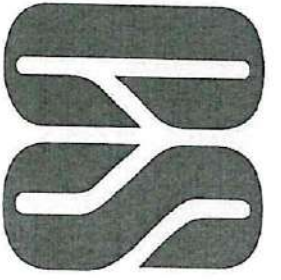
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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
5.	Composition of the Board of Directors	Regulation 17(1) of the SEBI (LODR) Regulations, 2015	The Company had not appointed Woman Director on the Board and violated the provisions of the Regulation 17 of the SEBI (LODR) Regulations, 2015	BSE	Fine	The Company had not appointed Woman Director on the Board and violated the provisions of the Regulation 17 of the SEBI (LODR) Regulations, 2015.	March, 2021	1,88,800	--	The Company has fulfilled the compliance requirement of composition of the Board of Directors by appointing Ms. Tanaya Singhal (DIN:08930315) as the Woman Director on the Board of the listed entity w.e.f. 02.11.2020 in place of Mrs. Richa Mishra (DIN: 00405282) who was resigned as the Independent Woman Director on 02.11.2020 and deposited the fine.	--	--





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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
						would be frozen if the compliance was not completed and fines not paid.						

For M/s Chetna Bhola & Associates
Company Secretaries
Peer Review No.: 2573/2022



Chetna Bhola
Partner
Mem. No.: A41283
C.P. No.: 15802
UDIN: A041283E000387101

Date: May 30, 2023
Place: New Delhi