



Aanchal Ispat Limited

CIN : L27106WB1996PLC076866 | GSTN/UID : 19AAACV8542M1ZQ | UDYAM-WB-08-0007012 | UAN : WB10C0007296

An ISO 9001:2015 Company



Date: 30/05/2024

To,
Department of Corporate Office,
BSE Limited
Phiroze JeeJeeBhoy Towers,
Dalal Street,
Mumbai- 400 001

Ref: Scrip Code. 538812, ISIN No.-INE322R01014

Sub: Filing of Annual Secretarial Compliance Report for the year ended on March 31, 2024

Dear Sir,

In compliance with Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirement), Regulations 2015 read with SEBI Circular CIR/CFD/ CMD1/27/2079 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by CS Manisha Saraf & Associates, Company Secretary in whole-time practice for the financial year 2023-2024.

You are requested to take the same on your records.

Thanking you,

Yours Faithfully,

For and on behalf of suspended Board of
Directors of Aanchal Ispat Limited

Mukesh
Goel

Digitally signed by
Mukesh Goel
Date: 2024.05.30
13:16:45 +05'30'

Mukesh Goel

For Aanchal Ispat Ltd

SANTANU
BRAHMA

Digitally signed by
SANTANU BRAHMA
Date: 2024.05.30
15:16:15 +05'30'

Mr. Santanu Brahma
(Resolution Professional)

Registration No.: IBBI/IPA-01/IP-P01482/2018-19/12251

Registered Office

J.L. No. 5, National Highway No.6,
Chamrail, Howrah 711114.
Phone : 033 22510128 / 033 23230052
Email : info@aanchalispac.com | aanchalispac1996@gmail.com
Visit us as www.aanchalispac.com



SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

To,
The Resolution Professional,
AANCHAL ISPAT LIMITED
Mouza-Chamarail, National Highway 6, Liluah,
Howrah- 711114

I Manisha Saraf, Practicing Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Aanchal Ispat Limited** (hereinafter referred as '**the listed entity**'), having its Registered Office at Mouza-Chamarail, National Highway 6, Liluah, Howrah-711114. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

During the period under review the Company was admitted into CIRP by The Hon'ble NCLT, Kolkata Bench vide order dated September 12, 2023, under the provisions of the IBC, 2016, and the company is currently under CIRP.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined:

- (a) all the documents and records made available to me and explanation provided by **Aanchal Ispat 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 31st 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 Securities and Exchange Board of India ("**SEBI**");



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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; ('Listing Regulations')
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the listed entity 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 listed entity during the Review Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the listed entity during the Review Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity 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 Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued there under;

I 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 PGS*
1.	<p><u>Secretarial Standards:</u></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	<p>None</p> <p>The Hon'ble NCLT, Kolkata Bench has admitted the company into CIRP by way of its order dated 12th September, 2023 under the provisions of IBC, 2016 and appointed Mr. Santanu Brahma as the Resolution Professional of the company by its order dated 17th November, 2023.</p>



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			Further in terms of SEBI (Listing Obligations and Disclosure Requirements) (Third Amendment) Regulations, 2018, Company undergoing the corporate insolvency resolution process is not required to comply with relevant Regulations of the SEBI (Listing Obligations Disclosure Requirements) Regulations, 2015 with respect to Board of Directors including that of Independent Director, Constitution, Meetings and terms of reference of the Audit Committee, Constitution, Meetings and terms of reference of the Nomination and Remuneration Committee and Constitution, Meetings and terms of reference of the Stakeholders Relationship Committee.
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI 	Yes	None
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • 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 	Yes	None
4.	<p><u>Disqualification of Director:</u></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	None



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5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>(a) NA (b) NA</p>	The Company has no subsidiaries.
6.	<p><u>Preservation of Documents:</u></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>	Yes	None
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	None
8.	<p><u>Related Party Transactions:</u></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>	Yes	The management of the company has informed that all related party transactions ("RPTs") were conducted on an arm's length basis; and prior approval from the Audit Committee was obtained.
9.	<p><u>Disclosure of events or information:</u></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>	Yes	Except for the information mentioned in 'Annexure-A'.
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None



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11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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 for the information mentioned in "Annexure-A" & "Annexure-B".
12.	<u>Additional non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	The additional non-compliances have been reported in "Annexure-A".

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		
(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	NA	No appointment or re-appointment
(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		
(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.		
2	Other conditions relating to resignation of statutory auditor		
(i)	Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: 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	NA	No such Resignation



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	<p>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 auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p>		
(ii)	Disclaimer in case of non-receipt of information: 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.		
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	No such resignation

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'.*

- (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	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response	Remarks
As per "Annexure-A"										



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

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remarks
As per "Annexure-B"										

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 certify 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 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 management has conducted the affairs of the listed entity.

**For Manisha Saraf & Associates
Practising Company Secretary**

Manisha Saraf



**Manisha Saraf
(Proprietor)**

Membership No: F7667

Certificate of Practice No: 8207

FRN: S2019WB666200

Peer Review Certificate No.: 2044/2022

UDIN: F007607F000503025

Date: May 30, 2024

Place: Kolkata

Annexure- "B"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
1	Regulation 23 (9) of SEBI LODR Regulations, 2015	Regulation 23(9)	-	Fine Imposed by Exchange	Fine	Delayed in submission of Related Party Transaction for the half year ended 30 th September, 2022	Rs. 2,00,600	The company was supposed to intimate the same within 15 days from the date of publication of its standalone and consolidated financial results i.e., 27 th November, 2022. However, the same was intimated on 29 th December, 2022 which results in the delay in reporting. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 1,70,000/-. This has been confirmed by the Exchange via email.	-	-
2	Regulation 30 of SEBI LODR Regulations, 2015	Regulation 30	-	-	-	Delayed in submission of AGM notice with exchange.	-	The Notice of the Annual General Meeting of the Company was dated 03.09.2022 and the Company was supposed to intimate the same with the exchange within twenty-four hours of the occurrence of the event. However, the Company has intimated the same on 14.09.2022 which results in the delay in reporting.	-	-
3	Regulation 3(5) & 3(6) SEBI (PIT) Regulations, 2015	Regulation 3(5) & 3(6)	-	-	-	The Company has not complied with the Regulation for quarter ended June, 22, September, 22 and December, 22.	-	The Company has not complied with the Regulation for quarter ended June, 22, September, 22 and December, 22.	-	-
4	Regulation 31 of SEBI (SAST) Regulations, 2011	Regulation 31	-	-	-	Delayed reporting of declaration by the promoter of the target Company along with the person acting in concert that they have not made any encumbrance directly or indirectly, other than those already disclosed during the financial year.	-	The Company was supposed to make the intimation within seven working days from the end of each financial year i.e., 08.04.2023. However, the same was reported on 10 th May, 2023 after receiving mail from BSE regarding non-submission of declaration under Regulation 31 (4).	-	-



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Annexure- "B"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
5	Regulation 17 of SEBI LODR Regulations, 2015	Regulation 17	-	Fine imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended June, 2022	Rs. 5,36,900	The Company has made an application to Bombay Stock Exchange ("BSE") for waiver of fees imposed on the Company. The payment of these fees is still pending.		
6	Regulation 17 of SEBI LODR Regulations, 2015	Regulation 17	-	Fine imposed by Exchange	Fine	The Chairman of the Company is an Executive Director; hence the Company was required to have at least half of the Board of Directors of Independent Director. Whereas, the Company has only two Independent Director out of total Five Directors of the Company for the quarter ended September, 2022.	Rs. 4,89,700	The Company has made an application to Bombay Stock Exchange ("BSE") for waiver of fees imposed on the Company. The payment of these fees is still pending.		
7	Regulation 17(1) of SEBI LODR Regulations, 2015	Regulation 17(1)	-	Fine imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended December, 2021	Rs. 2,30,100	The Company applied to the exchange requesting a waiver of fees imposed on November 07, 2022. However, the exchange did not grant the waiver, and this was communicated to the Company via email on January 24, 2023. Subsequently, the Company submitted a second waiver request on May 04, 2023, following Annexure1_BSE Circular dated March 31, 2022. The payment of these fees is still pending.		



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Annexure- "B"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response	Remark
8	Regulation 17(1) of SEBI LODR Regulations, 2015	Regulation 17(1)	-	Fine imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended March, 2022	Rs. 5,31,000	The Company applied to the exchange requesting a waiver of fees imposed on November 07, 2022. However, the exchange did not grant the waiver, and this was communicated to the Company via email on January 24, 2023. Subsequently, the Company submitted a second waiver request on May 04, 2023, following Annexure1_BSE Circular dated March 31, 2022. The payment of these fees is still pending.		
9	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	Fine imposed by Exchange	Fine	Delayed in submission of Shareholding Pattern for the quarter ended 31st December, 2021	Rs. 2,90,200	The Company has made an application to the exchange requesting to waive the fees imposed on the Company vide letter dated November 07, 2022. However, the said fee was not waived off by the Exchange and the same was communicated to the Company on January 23, 2023 via e-mail. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 2,46,000. This has been confirmed by the Exchange via email.		
10	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	Fine imposed by Exchange	Fine	Delayed in submission of Shareholding Pattern for the quarter ended 31st March, 2022	Rs. 82,600	The Company has made an application to the exchange requesting to waive the fees imposed on the Company vide letter dated November 07, 2022. However, the said fee was not waived off by the Exchange and the same was communicated to the Company on January 23, 2023 via e-mail. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 70,000/-. This has been confirmed by the Exchange via email.		



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Annexure- "B"

Sr	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/Remarks of the Practicing Company Secretary	Management Response	Remark
1	Regulation 23 (9) of SEBI LODR Regulations, 2015	Regulation 23(9)	-	Fine imposed by Exchange	Fine	Delayed in submission of Related Party Transaction for the half year ended 30 th September, 2022	Rs. 2,00,600	The company was supposed to intimate the same within 15 days from the date of publication of its standalone and consolidated financial results i.e., 27 th November, 2022. However, the same was intimated on 29 th December, 2022 which results in the delay in reporting. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 1,70,000/-. This has been confirmed by the Exchange via email.	-	-
2	Regulation 30 of SEBI LODR Regulations, 2015	Regulation 30	-	-	-	Delayed in submission of AGM notice with exchange.	-	The Notice of the Annual General Meeting of the Company was dated 03.09.2022 and the Company was supposed to intimate the same with the exchange within twenty-four hours of the occurrence of the event. However, the Company has intimated the same on 14.09.2022 which results in the delay in reporting.	-	-
3	Regulation 3(5) & 3(6) SEBI (PIT) Regulations, 2015	Regulation 3(5) & 3(6)	-	-	-	The Company has not complied with the Regulation for quarter ended June, 22, September, 22 and December, 22.	-	The Company has not complied with the Regulation for quarter ended June, 22, September, 22 and December, 22.	-	-
4	Regulation 31 of SEBI (SAST) Regulations, 2011	Regulation 31	-	-	-	Delayed reporting of declaration by the promoter of the target Company along with the person acting in concert that they have not made any encumbrance directly or indirectly, other than those already disclosed during the financial year.	-	The Company was supposed to make the intimation within seven working days from the end of each financial year i.e., 08.04.2023. However, the same was reported on 10 th May, 2023 after receiving mail from BSE regarding non-submission of declaration under Regulation 31 (4).	-	-



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Annexure- "B"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
5	Regulation 17 of SEBI LODR Regulations, 2015	Regulation 17	-	Fine imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended June, 2022	Rs. 5,36,900	The Company has made an application to Bombay Stock Exchange ("BSE") for waiver of fees imposed on the Company. The payment of these fees is still pending.	-	-
6	Regulation 17 of SEBI LODR Regulations, 2015	Regulation 17	-	Fine imposed by Exchange	Fine	The Chairman of the Company is an Executive Director; hence the Company was required to have at least half of the Board of Directors of Independent Director. Whereas, the Company has only two Independent Director out of total Five Directors of the Company for the quarter ended September, 2022.	Rs. 4,89,700	The Company has made an application to Bombay Stock Exchange ("BSE") for waiver of fees imposed on the Company. The payment of these fees is still pending.	-	-
7	Regulation 17(1) of SEBI LODR Regulations, 2015	Regulation 17(1)	-	Fine imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended December, 2021	Rs. 2,30,100	The Company applied to the exchange requesting a waiver of fees imposed on November 07, 2022. However, the exchange did not grant the waiver, and this was communicated to the Company via email on January 24, 2023. Subsequently, the Company submitted a second waiver request on May 04, 2023, following Annexure1_BSE Circular dated March 31, 2022. The payment of these fees is still pending.	-	-



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Annexure- "B"

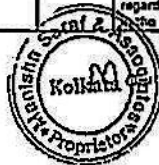
Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response	Remark
8	Regulation 17(1) of SEBI LODR Regulations, 2015	Regulation 17(1)	-	Fine Imposed by Exchange	Fine	Non-compliance with requirements pertaining to the composition of the Board for the quarter ended March, 2022	Rs. 5,31,000	The Company applied to the exchange requesting a waiver of fees imposed on November 07, 2022. However, the exchange did not grant the waiver, and this was communicated to the Company via email on January 24, 2023. Subsequently, the Company submitted a second waiver request on May 04, 2023, following Annexure1_BSE Circular dated March 31, 2022. The payment of these fees is still pending.		
9	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	Fine Imposed by Exchange	Fine	Delayed in submission of Shareholding Pattern for the quarter ended 31st December, 2021	Rs. 2,50,280	The Company has made an application to the exchange requesting to waive the fees imposed on the Company vide letter dated November 07, 2022. However, the said fee was not waived off by the Exchange and the same was communicated to the Company on January 23, 2023 via e-mail. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 2,46,000. This has been confirmed by the Exchange via email.		
10	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	Fine Imposed by Exchange	Fine	Delayed in submission of Shareholding Pattern for the quarter ended 31st March, 2022	Rs. 82,600	The Company has made an application to the exchange requesting to waive the fees imposed on the Company vide letter dated November 07, 2022. However, the said fee was not waived off by the Exchange and the same was communicated to the Company on January 23, 2023 via e-mail. The Company has made the payment of the basic fine levied by the Exchange, i.e., the amount excluding GST, amounting to Rs. 70,000/-. This has been confirmed by the Exchange via email.		



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Annexure - "A"

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation No./Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
1	Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 7(2)(a)- Confidential Disclosures	-	-	-	Non-submission of the disclosure by the promoter, member of the promoter group, designated person, or director of every company regarding the number of securities acquired or disposed, if the total value of the securities exceeds 10 lakh rupees in a calendar quarter.	-	Every promoter, member of the promoter group, designated person and director of every company shall disclose the same within two trading days of receipt of the disclosure or from becoming aware of such information.	The Company was unaware of the said compliance.	-
2	Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 7(2)(b)- Confidential Disclosures	-	-	-	Non-submission of information regarding transactions occurring under Regulation 7(2)(a) to the stock exchange.	-	Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information. There has been a significant sale of shares in the promoter shareholding of the company. For the quarter ended June 2023, the shareholding was 45.48%; for September 2023, it was 32.21%; and for the quarter ended December 2023, it was 32.09%. The shares have been sold in the open market.	The Company was unaware of the said compliance.	-
3	Regulation 29 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Regulation 29	-	-	-	Non-submission of disclosure w.r.t. acquisition and disposal of shares or voting rights.	-	The disclosures under Regulation 29 shall be made within two working days of the receipt of intimation of allotment of shares, of the acquisition of shares or voting rights in the target company to, - (i) every stock exchange where the shares of the target company are listed; and (ii) the target company at its registered office. There has been a significant sale of shares in the promoter shareholding of the company. For the quarter ended June 2023, the shareholding was 45.48%; for September 2023, it was 32.21%; and for the quarter ended December 2023, it was 32.09%. The shares have been sold in the open market. The company has not complied with the regulations regarding the reduction of shares and the sale of shares in the open market.	The Company was unaware of the said compliance.	-



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Annexure - "A"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response	Remark
4	Regulation 6(1) of SEBI LODR Regulations, 2015	Regulation 6(1)	-	Fine imposed by exchange	Fine	Non-compliance with requirement to appoint a qualified Company Secretary as the Compliance Officer	Rs. 22,500/- (Inclusive of GST)	The Company has not appointed any qualified Company Secretary as the Compliance Officer. The said fees were required to be paid within 15 days from the date of this letter, and the same has not been paid.	The company is in the process of finding a Company Secretary & Compliance Officer, but due to the ongoing CDP process, suitable candidates are not coming up, causing delays in the process.	-
5	Regulation 29 of SEBI LODR Regulations, 2015	Regulation 29	-	-	-	Non-submission of Intimation for the Board Meeting held for the quarter ended March 31, 2023 in XBRL mode	-	The company was required to intimate the same in XBRL mode within 24 hours of its submission in PDF mode, which was submitted on 22.03.2023. Therefore, it was required to be submitted by 24.03.2023. However, as of today, the intimation has not been submitted.	The company assures compliance with the time limits prescribed under the regulation.	-
6	Regulation 29 of SEBI LODR Regulations, 2015	Regulation 29	-	-	-	Non-submission of Intimation for the Board Meeting held for the quarter ended June 30, 2023 in XBRL mode	-	The company was required to intimate the same in XBRL mode within 24 hours of its submission in PDF mode, which was submitted on 07.08.2023. Therefore, it was required to be submitted by 09.08.2023. However, as of today, the intimation has not been submitted.	The company assures compliance with the time limits prescribed under the regulation.	-
7	Company's Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015	Closure of Trading Window	-	-	-	Delay in intimation of closure of trading window from 28th April, 2023 till 48 hours after the announcement of the financial results of the Company for the quarter and year ended 31st March, 2023	-	The company intimated the closure on April 1, 2023, but it should have been intimated on or before March 31, 2023.	The company assures compliance with the time limits prescribed under the regulation.	-
8	Regulation 30 of SEBI LODR Regulations, 2015	Regulation 30	-	-	-	Non-submission of Outcome of Board meeting held for the quarter ended September 30, 2023	-	The company has not submitted the outcome of the Board Meeting for the quarter ended September 30, 2023, to the exchange, citing the company's status under Corporate Insolvency Resolution Process (CIRP).	Company in under CIRP w.e.f 17/09/2023 and hence no Board Meeting is held after 11.01.2023 and therefore, no Outcome can be filed.	-



Kulkarni Sarai

Annexure - "A"


Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
9	Regulation 33 of SEBI LODR Regulations, 2015	Regulation 33	-	Fine imposed by Exchange	Fine	Delay in submission of financial results for the quarter ended September 30, 2023	Rs. 2,00,000 (Rupees of 05%)	The company was required to intimate the same by November 14, 2023. However, it was intimated on October 17, 2023, resulting in delayed reporting. The information was communicated again on December 21, 2023, as the label communication to the exchange on December 19, 2023, did not specify the time for the commencement and conclusion of the meeting.	The company has been under CMP since 12.09.2023. Therefore, no Board Meetings have been held after this date, and no outcomes can be filed.	Since the financial results have been approved by the Resolution Professional, they need to be uploaded and communicated to the Exchange.
10	Regulation 33 of SEBI LODR Regulations, 2015	Regulation 33	-	-	-	Delay in submission of financial results in XBRL mode for the quarter ended September 30, 2023	-	The Company was required to inform the exchange regarding the financial results for the quarter ended September 30, 2023, in XBRL format within 24 hours of the submission of the same in PDF, i.e., by 24 hours of December 19, 2023. However, it was communicated on December 21, 2023, resulting in a delay.	The company has been under CMP since 12.09.2023, resulting in a procedural delay in filing the said regulations.	-
11	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	-	-	Clarification is sought regarding the discrepancies found in the shareholding pattern submitted by the company for the quarters ended September 30, 2023, and December 31, 2023. Additionally, a revised filing of the shareholding pattern is requested.	-	The Company has timely filed the shareholding pattern under Regulation 31 of LODR for the quarters ended September 30, 2023, and December 31, 2023. However, due to some discrepancies found by the exchange, the exchange asked the Company to submit a revised shareholding pattern for both quarters in XBRL format. This was intimated on October 26, 2023, and February 13, 2024.	Clarification was duly given by the company.	-
12	Regulation 23 (1) of SEBI LODR Regulations, 2015	Regulation 23(1)	-	Fine imposed by Exchange	Fine	Delay in submission of Related Party Transaction for the half year ended 30 th September, 2023	-	The company was supposed to intimate the same within every six months as the date of publication of its standalone audited consolidated financial results, i.e., 19.07.2023. However, it was intimated on January 9, 2024, resulting in a delay in reporting.	The company has been under CMP since 12.09.2023, resulting in a procedural delay in filing the said regulations.	-



sha Sonal

Annexure- "A"

Sr	Compliance Requirement (Regulations/ Circulars/ guidelines including specific clause)	Regulation/ Circular No.	Details	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practicing Company Secretary	Management Response	Remark
13	Regulation 27 (2) of SEBI LODR Regulations, 2015	Regulation 27(2)	-	Fine imposed by Exchange	Fine	Delay in submission of Corporate Governance Report for the quarter ended 30 th September, 2023	Rs. 2,100/- (Inclusive of GST)	The Company was required to intimate the same by October 21, 2023. However, it was intimated on October 25, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
14	Regulation 47 of SEBI LODR Regulations, 2015	Regulation 47	-	-	-	Delay in publication of financial results in the national daily newspaper for the quarter and half-year ended September 30, 2023	-	The Company was required to intimate the same within 48 hours of the conclusion of the meeting. The meeting concluded on December 13, 2023. Hence, the intimation should have been reported by December 17, 2023, but it was reported on December 21, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
15	Regulation 30 of SEBI LODR Regulations, 2015	Regulation 30	-	-	-	Delay in intimation regarding the resignation of Mr. Pooja Meel from the post of Company Secretary and Compliance Officer of the Company, effective from September 12, 2023.	-	The Company was required to intimate the same within 24 hours of the occurrence of the event, i.e., by September 13, 2023. However, the intimation was made on September 14, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
16	Regulation 36 of SEBI LODR Regulations, 2015	Regulation 36	-	-	-	Delay in sending the annual report to the holders of securities	-	The Company was required to send the annual report to the holders of securities not less than twenty-one days before the annual general meeting, i.e., by September 7, 2023. However, it was sent on September 9, 2023, resulting in a delay.	The company assures that it will comply with the time limits prescribed under the regulation.	-
17	Regulation 30 of SEBI LODR Regulations, 2015 read with Schedule III, Part A, Point No. 15	Regulation 30	-	-	-	Delayed intimations of information as specified in Schedule III, Part A, Point No. 15.	-	The Hon'ble NCLT, Kolkata Bench admitted the company into Corporate Insolvency Resolution Process (CIRP) through its order dated September 12, 2023, under the provisions of the Insolvency and Bankruptcy Code, 2016. The company is required to make the intimations as per Schedule III, Part A, Point No. 15. However, these intimations were delayed.	The company has been under CIRP since 12/09/2023, resulting in a procedural delay in filing under the said regulation.	-


 S. S. S. & Associates
 Proprietors
 sha karab

Annexure- "A"


Sr	Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
1	Regulation 7 of SEOI (Prohibition of Insider Trading) Regulations, 2015	Regulation 7(2)(a)- Confidential Disclosures	-	-	-	Non-submission of the disclosure by the promoter, member of the promoter group, designated person, or creditor of every company regarding the number of securities acquired or disposed, if the traded value of the securities exceeds 10 lakh rupees in a calendar quarter.	-	Every promoter, member of the promoter group, designated person and director of every company shall disclose the same within two trading days of receipt of the disclosure or from becoming aware of such information.	The Company was unaware of the said Compliance.	-
2	Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Regulation 7(2)(b)- Confidential Disclosures	-	-	-	Non-submission of information regarding transactions occurring under Regulation 7(2)(a) in the stock exchange.	-	Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information. There has been a significant sale of shares in the promoter shareholding of the company. For the quarter ended June 2023, the shareholding was 45.48%; for September 2023, it was 32.21%; and for the quarter ended December 2023, it was 32.02%. The shares have been sold in the open market.	The Company was unaware of the said Compliance.	-
3	Regulation 29 of SEOI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Regulation 29	-	-	-	Non-submission of disclosure w.r.t. acquisition and disposal of shares or voting rights.	-	The disclosure under Regulation 29 shall be made within two working days of the receipt of intimation of allotment of shares, or the acquisition of shares or voting rights in the target company in, --(i) every stock exchange where the shares of the target company are listed; and (ii) the target company at its registered office. There has been a significant sale of shares in the promoter shareholding of the company. For the quarter ended June 2023, the shareholding was 45.48%; for September 2023, it was 32.21%; and for the quarter ended December 2023, it was 32.02%. The shares have been sold in the open market. The company has not complied with the regulations regarding the reduction of shares and the sale of shares in the open market.	The Company was unaware of the said Compliance.	-



Saral

Annexure- "A"


Sr	Compliance Requirement (Regulations/ guidelines/ including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
4	Regulation 6(1) of SEBI LODR Regulations, 2015	Regulation 6(1)	-	Fine imposed by exchange	Fine	Non-compliance with requirement to appoint a qualified Company Secretary as the Compliance Officer.	Rs. 23,600/- (inclusive of GST)	The Company has not appointed any qualified Company Secretary as the Compliance Officer. The cost fees were required to be paid within 15 days from the date of this letter, and the same has not been paid.	The company is in the process of finding a Company Secretary & Compliance Officer, but due to the ongoing CRP process, suitable candidates are not turning up, causing delays in the process.	-
5	Regulation 29 of SEBI LODR Regulations, 2015	Regulation 29	-	-	-	Non-submission of information for the Board Meeting held for the quarter ended March 31, 2023 in XBRL mode.	-	The company was required to intimate the same in XBRL mode within 24 hours of its submission in PDF mode, which was submitted on 23.03.2023. Therefore, it was required to be submitted by 24.03.2023. However, as of today, the intimation has not been submitted.	The company ensures compliance with the time limits prescribed under the regulation.	-
6	Regulation 29 of SEBI LODR Regulations, 2015	Regulation 29	-	-	-	Non-submission of information for the Board Meeting held for the quarter ended June 30, 2023 in XBRL mode.	-	The company was required to intimate the same in XBRL mode within 24 hours of its submission in PDF mode, which was submitted on 07.08.2023. Therefore, it was required to be submitted by 08.08.2023. However, as of today, the intimation has not been submitted.	The company ensures compliance with the time limits prescribed under the regulation.	-
7	Company's Code of Conduct under the SCOD (Prohibition of Insider Trading) Regulations, 2015	Closure of Trading Window	-	-	-	Delay in intimation of closure of trading window from 1st April, 2023 on 48 hours after the announcement of the financial results of the Company for the quarter and year ended 31st March, 2023.	-	The company intimated the closure on April 1, 2023, but it should have been intimated on or before March 31, 2023.	The company ensures compliance with the time limits prescribed under the regulation.	-
8	Regulation 30 of SEBI LODR Regulations, 2015	Regulation 30	-	-	-	Non-submission of Outcome of Board meeting held for the quarter ended September 30, 2023	-	The company has not submitted the outcome of the Board Meeting for the quarter ended September 30, 2023, to the exchange, citing the company's status under Corporate Insolvency Resolution Process (CIRP).	Company is under CIRP w.e.f 12/03/2023 and hence no Board Meeting is held after 12.03.2023 and therefore, no Outcome can be filed.	-



 Maheshwar Saraf & Associates
 Kolkata
 Proprietors

Annexure- "A"

Sl	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
9	Regulation 33 of SEBI LODR Regulations, 2015	Regulation 33	-	Fine imposed by Exchange	fine	Delay in submission of financial results for the quarter ended September 30, 2023	Rs. 2,02,600 (exclusive of GST)	The company was required to intimate the same by November 24, 2023. However, it was intimated on December 19, 2023, resulting in delayed reporting. The information was communicated again on December 21, 2023, as the initial communication to the exchange on December 19, 2023, did not specify the time for the commencement and conclusion of the meeting.	The company has been under CERP since 12.09.2023. Therefore, no Board Meetings have been held after this date, and no outcomes can be filed.	Since the financial results have been approved by the Statutory Professional, they need to be uploaded and communicated to the Exchange.
10	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	-	-	Delay in submission of financial results in XBRL mode for the quarter ended September 30, 2023	-	The Company was required to inform the exchange regarding the financial results for the quarter ended September 30, 2023, in XBRL format within 24 hours of the submission of the same in PDF, i.e., by 26 hours of December 19, 2023. However, it was communicated on December 21, 2023, resulting in a delay.	The company has been under CERP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
11	Regulation 31 of SEBI LODR Regulations, 2015	Regulation 31	-	-	-	Clarification is sought regarding the discrepancies found in the shareholding pattern submitted by the company for the quarters ended September 30, 2023, and December 31, 2023. Additionally, a revised filing of the shareholding pattern is requested.	-	The Company has timely filed the shareholding pattern under Regulation 31 of LODR for the quarters ended September 30, 2023, and December 31, 2023. However, due to some discrepancies found by the exchange, the exchange asked the Company to submit a revised shareholding pattern for both quarters in XBRL format. This was intimated on October 26, 2023, and February 13, 2024.	Clarification was duly given by the company.	-
12	Regulation 23 (9) of SEBI LODR Regulations, 2015	Regulation 23(9)	-	Fine imposed by Exchange	fine	Delay in submission of Related Party Transaction for the half year ended 30 th September, 2023	-	The company was supposed to intimate the same within every six months on the date of publication of its standalone and consolidated financial results, i.e., 19.12.2023. However, it was intimated on January 9, 2024, resulting in a delay in reporting.	The company has been under CERP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-



 Institute of Cost Accountants of India
 Kolkata Chapter
 Mr. [Signature]
 Proprietor

Annexure- "A"

Sr	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Violation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/ Remarks of the Practising Company Secretary	Management Response	Remark
13	Regulation 27 (2) of SEBI LODR Regulations, 2015	Regulation 27(2)	-	Fine imposed by Exchange	fine	Delay in submission of Corporate Governance Report for the quarter ended 30 th September, 2023	Rs. 2,363/- (inclusive of GST)	The Company was required to intimate the same by October 21, 2023. However, it was intimated on October 25, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
14	Regulation 47 of SEBI LODR Regulations, 2015	Regulation 47	-	-	-	Delay in publication of financial results in the national daily newspaper for the quarter and half-year ended September 30, 2023	-	The Company was required to intimate the same within 48 hours of the conclusion of the meeting. The meeting concluded on December 15, 2023. Hence, the intimation should have been reported by December 17, 2023, but it was reported on December 21, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
15	Regulation 20 of SEBI LODR Regulations, 2015	Regulation 20	-	-	-	Delay in intimation regarding the resignation of Mr. Pooja Kaul from the post of Company Secretary and Compliance Officer of the Company, effective from September 12, 2023	-	The Company was required to intimate the same within 24 hours of the occurrence of the event, i.e., by September 13, 2023. However, the intimation was made on September 14, 2023, resulting in delayed reporting.	The company has been under CIRP since 12.09.2023, resulting in a procedural delay in filing the said regulation.	-
16	Regulation 36 of SEBI LODR Regulations, 2015	Regulation 36	-	-	-	Delay in sending the annual report to the holders of securities	-	The Company was required to send the annual report to the holders of securities not less than twenty-one days before the annual general meeting, i.e., by September 7, 2023. However, it was sent on September 9, 2023, resulting in a delay.	The company assures that it will comply with the time limits prescribed under the regulation.	-
17	Regulation 20 of SEBI LODR Regulations, 2015 read with Schedule III, Part A, point no. 16	Regulation 20	-	-	-	Delayed intimation of information as specified in Schedule III, Part A, Point No. 16.	-	The Hon'ble NCLT, Kolkata Bench admitted the company into Corporate Insolvency Resolution Process (CIRP) through its order dated September 12, 2023, under the provisions of the Insolvency and Bankruptcy Code, 2016. The company is required to make the intimations as per Schedule III, Part A, Point No. 16. However, these intimations were delayed.	The company has been under CIRP since 12/09/2023, resulting in a procedural delay in filing under the said regulation.	-



ha Saraf