

May 29, 2023

<b>To,</b> <b>The Manager,</b> <b>Listing Department,</b> <b>BSE Limited,</b> <b>Phiroze Jeejeebhoy Tower, Dalal Street,</b> <b>Mumbai – 400001.</b> <b>Tel No.: 22721233</b> <b>Fax No.: 22723719/22723121/22722037</b> <b>BSE Scrip Code: 540776</b>	<b>To,</b> <b>The Manager,</b> <b>Listing Department,</b> <b>The National Stock Exchange of India Ltd.,</b> <b>Exchange Plaza, 5 Floor, Plot C/1, G Block,</b> <b>Bandra - Kurla Complex, Bandra (E),</b> <b>Mumbai – 400051.</b> <b>Tel No.: 2659 8235 Fax No.: 26598237</b> <b>NSE Symbol: 5PAISA</b>
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Dear Sir/Madam,

**Sub: Submission of Annual Secretarial Compliance Report for year ended March 31, 2023:**

In terms of Regulation 24A of the SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015, we are enclosing the Annual Secretarial Compliance Report dated May 26, 2023 issued by M/s. Nilesh Shah & Associates, Practicing Company Secretaries for the financial year ended on March 31, 2023.

Kindly take the above on record and oblige.

Thanking you,

**For 5paisa Capital Limited**

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**Namita Godbole**  
**Company Secretary & Compliance Officer**  
**Membership No.:A21056**

**Email ID: [csteam@5paisa.com](mailto:csteam@5paisa.com)**

**Encl: as above**

# NILESH SHAH & ASSOCIATES

Company Secretaries

## ANNUAL SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2023:

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To

The Board of Directors,  
**5paisa Capital Limited**  
IIFL House, Sun Infotech Park,  
Road No. 16V, Plot No. B-23,  
Thane Industrial Area,  
Wagle Estate, Thane – 400 604

Dear Sir/Madam,

We, Nilesh Shah & Associates, Company Secretaries in Practice, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **5paisa Capital Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at IIFL House, Sun Infotech Park, Road No. 16V, Plot No. B-23, Thane Industrial Area, Wagle Estate, Thane – 400 604. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our 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, we hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter.

We have examined:

- (a) all documents and records made available to us and explanation provided by **5paisa Capital Limited** (hereinafter called "the listed entity"),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document / filing, as may be relevant, which has been relied upon to make this report,

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for the financial year ended 31<sup>st</sup> March, 2023 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 (SEBI LODR Regulation);
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- (f) Securities and Exchange Board of India (Depository & Participant) Regulations, 2018;
- (g) Securities and Exchange Board of India (Stock-Brokers and Sub-Brokers) Regulations, 1992;
- (h) Securities and Exchange Board of India (Research Analyst) Regulations, 2014; NO ACTIVITIES DURING THE YEAR.
- (i) Securities and Exchange Board of India (Investment Advisors) Regulations, 2013; NO ACTIVITIES DURING THE YEAR.



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and circular / guidelines issued thereunder.

and based on the above examination, we hereby report that, during the financial year ended **31<sup>st</sup> March, 2023:**

I. (a) The Company has complied with the provisions of the above Regulations (As was applicable to the Company) and circulars/ guidelines issued thereunder except in respect of matters specified below: **(As per "Annexure – B")**.

(b) The Listed entity has taken the following actions to comply with the observations made in previous reports: **(As per "Annexure – C")**

II. 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/R emark by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor : (N.A. – Since No Resignation of Auditor during Reporting Period)		
	<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.	N.A. – No Resignation of Auditor during Reporting Period.



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2.	Other conditions relating to resignation of statutory auditor : (N.A. – Since No resignation of Auditor during reporting period)		
	<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 auditor relating to the proposal to resign as</p>	N.A.	N.A. – No Resignation of Auditor, during Reporting Period.



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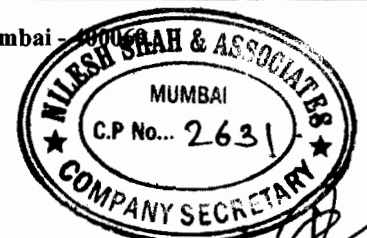
	<p>mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	<p>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.</p>	N.A.	N.A. – No Resignation of Auditor, during Reporting Period.

Based on the examination of the above referred documents and records, and pursuant to Circular Ref. No. NSE/CML/ 2023/21 dated March 16, 2023 issued by National Stock Exchange of India Limited and Notice No. 20230316-14 dated March 16, 2023 issued by BSE Limited, we hereby further report / affirm 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/Remark by PCS
1.	<p><b><u>Secretarial Standard:</u></b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	N.A. (Since Secretarial Standard followed by the Company)

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remark by PCS
2.	<b><u>Adoption and timely updation of the Policies:</u></b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity.</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed and timely updated, as per the regulations/ circulars/ guidelines issued by SEBI.</li></ul>	Yes  Yes	N.A. (Since Complied)
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website.</li><li>Timely dissemination of the documents/ information under a separate section on the website.</li><li>Web-links provided in annual corporate governance report under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.</li></ul>	Yes  Yes  Yes	N.A. (Since Complied)
4.	<b><u>Disqualification of Director:</u></b> <p>None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	N.A. (Since No Directors are disqualified)

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remark by PCS
5.	<p><b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b></p> <p>a) identification of material subsidiary companies</p> <p>b) Disclosure Requirement of material as well as other subsidiaries.</p>	Yes	N.A. (Since Complied)
		Yes	
6.	<p><b><u>Preservation of Documents:</u></b></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	N.A. (Since Complied)
7.	<p><b><u>Performance Evaluation:</u></b></p> <p>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.</p>	Yes	N.A. (Since Complied)
8.	<p><b><u>Related Party Transactions:</u></b></p> <p>a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions, Or</p> <p>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	N.A
		NA	Related party transactions are taken with the prior approval

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remark by PCS
9.	<b><u>Disclosure of events or information:</u></b>  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	N.A. (Since Complied)
10.	<b><u>Prohibition of Insider Trading:</u></b>  The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	N.A. (Since Complied)
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b>  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	N.A. (Since Complied)



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12	<b>Additional Non-compliances, if any:</b> No any additional non-compliance observed for any SEBI regulation/ circular /guidance note etc.	No	N.A
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Date: 26.05.2023

Place: Mumbai

UDIN: F004554E000394273

Signature:

Name: Nilesh Shah  
For Nilesh Shah & Associates  
Company Secretaries

FCS : 4554

C.P. : 2631

Peer Review No. 698/2020



This report is to be read with our letter of even date which is annexed as Annexure A and forms an integral part of this report.

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# NILESH SHAH & ASSOCIATES

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## “Annexure A”

Our report of even date is to be read along with this letter.

### Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of 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.

Date: 26.05.2023

Place: Mumbai

UDIN: F004554E000394273

Signature:

Name: Nilesh Shah

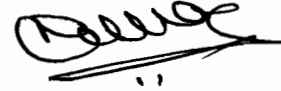
For Nilesh Shah & Associates

Company Secretaries

FCS : 4554

C.P. : 2631

Peer Review No. 698/2020



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“Annexure – B”

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The Company is required to submit quarterly compliance report on corporate governance to the stock exchange within 21 days.	Regulation 27(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has file revised quarterly compliance report on corporate governance for the quarter ended 30th September, 2022 in delay as the original	None	Voluntary request was made by the Company for submitting revised corporate governance report which was duely allowed by exchange.	The revised quarterly compliance report on corporate governance for the quarter ended 30 <sup>th</sup> September, 2022 was filed in delay as the original report which was filed within due date in which, a date of Risk Management Committee Meeting	No Fine was imposed	The revised quarterly compliance report on corporate governance for the quarter ended 30 <sup>th</sup> September, 2022 was filed in delay by the company voluntarily on noticing that a date of Risk Management Committee was missed out. However, the original report was file within the due date.	The Company shall due care in filing quarterly corporate governance report	None

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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	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
			report which was filed within due date in which, a date of Risk Management Committee Meeting was missed out. However, the original report was filed within the prescribed timelines.			was missed out. However, the original report was filed within the prescribed timelines.				



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“Annexure – C”

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The listed entity shall submit a statement showing holding of securities and shareholding pattern in the format specified by SEBI on a quarterly basis, within twenty-one days from the end of each quarter.	Regulation 31(1)(b) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	The Company has delayed in filing revised Shareholding pattern.	Not Applicable	Not Applicable	While filing the Shareholding Pattern for Quarter Ended 30th June, 2021, the details of Shareholders holding more than 1% of the shares was not disclosed. The Company has done revised filing of said Shareholding Pattern with	No fine imposed	The Company has inadvertently missed disclosing details of Shareholders holding more than 1% of the Shares while filing Shareholding Pattern for the Quarter Ended 30th June, 2021 which was corrected by filing revised Shareholding Pattern after the due date.	The Company shall take due care in filing Shareholding pattern.	None

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Sr. No.	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
						correct disclosures after the due date of filing.				



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