

# SRESTHA FINVEST LIMITED

Date: 15<sup>th</sup> May 2020

To  
The Manager  
Listing Department

1. Bombay Stock Exchange Ltd, Mumbai
2. Metropolitan Stock Exchange of India Ltd, Mumbai.

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Year Ended 31/03/2020**  
**Ref: SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 08, 2019**

Please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020, issued by M/s. AXN Prabhu & Associates, Practising Company Secretaries and Secretarial Auditors of our Company.

This is for your information and records.

**Yours faithfully,**  
**For Srestha Finvest Limited**

**Sd/-**  
**Kamlesh Parasmal**  
**Whole time Director**  
**DIN: 00810823**

**Encl: as above**

**P.S.: Justification for non-submission of signed copy of the disclosure:**

As per the MCA's advisory on preventive measures to contain the spread of COVID-19 and the implementation of the Company's "Work from Home Policy", this disclosure is being submitted without signature, i.e., in Sd/- Format.



**Secretarial Compliance Report of SresthaFinvest Limited  
for the year ended March 31, 2020**

I, **AXN Prabhu**, have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s.SresthaFinvest 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 **March 31, 2020** ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI ACT") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
  - (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - (d) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018;
- and circulars/guidelines issued thereunder;

and based on the above examination, I hereby report that, during the review period;



- (a) The Listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder,
- (b) The listed entity has maintained proper record under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- (c) There were no actions taken against the listed entity/directors/ material subsidiaries either by SEBI or by stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The company has reported Non Compliance of Regulation 95 (1) of SEBI (ICDR) Regulations, 2009 for delay of six days wherein the Stock Exchanges had imposed penalty of Rs. 141600/-	31st March, 2019	The Company has paid the amount of penalty	The company has duly remitted the said amount and complied with it accordingly.

Place: Chennai  
Date: 13/05/2020

For M/s AXN Prabhu & Associates  
Company Secretaries



*[Signature]*  
AXN Prabhu  
Proprietor

FCS: 3902 | C.P. NO. 11440  
UDIN: F003902B000236057