



Date: 30.05.2024

To,
The Department of Corporate Services,
BSE Limited
PhirozeJeejeebhoy Towers,
Dalal Street, Mumbai - 400001

Reference: Scrip Code - 501314

Subject: Submission of Annual Secretarial Compliance Report of Company for the year ended March 31, 2024 pursuant to Regulation 24A of SEBI (LODR) (Amendment) Regulations, 2018

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018, please find herewith enclosed the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2024, as issued by M/s. Nitesh Chaudhary & Associates, Practicing Company Secretary on May 30, 2024.

Please find the same in order and acknowledge the receipt.

Thanking You,
Yours Faithfully,

For Prismx Global Ventures Limited

RAVINDRA BHASKAR
DESHMUKH

Digitally signed by RAVINDRA
BHASKAR DESHMUKH
Date: 2024.05.30 18:49:02 +05'30'

Ravindra Bhaskar Deshmukh
Director and CEO
DIN: 00290973

+91 9136993920



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No. 3, Vile Parle (East), Mumbai - 400057





NITESH CHAUDHARY & ASSOCIATES
PRACTISING COMPANY SECRETARY

To
The Board of Directors
PRISMX GLOBAL VENTURES LIMITED
2ND FLOOR, PURVA BUILDING,
TEJPAL SCHEME ROAD NO. 3, VILE PARLE (EAST),
MUMBAI MH 400057 IN,

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2023-24.

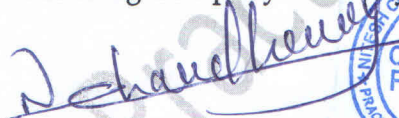
I have been engaged by PRISMX GLOBAL VENTURES LIMITED (hereinafter referred to as "the Company") bearing CIN: L74110MH1973PLC016243 whose equity shares listed on Bombay Stock exchange to conduct audit in terms of Regulations 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the Company to maintains records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/ guidelines issued thereunder 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 provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance report issued by the Institute of Company Secretaries of India and in a manner, which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Nitesh Chaudhary & Associates
Practising Company Secretary


Nitesh Chaudhary, Proprietor

Mem. No FCS: 10010

COP No: 16275

Date: 30/05/2024

UDIN: F010010F000503338





ANNUAL SECRETARIAL COMPLIANCE REPORT OF PRISMx GLOBAL VENTURE LIMITED

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

(Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
Board of Directors,
PRISMx GLOBAL VENTURES LIMITED
2ND FLOOR, PURVA BUILDING,
TEJPAL SCHEME ROAD NO. 3, VILE PARLE (EAST),
MUMBAI MH 400057 IN,

We have examined

- (a) all the documents and records made available to us and explanation provided by **M/s. Prismx Global Ventures 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, 2024** in respect of compliance with the provisions of:

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

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 for the year under review).
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (not applicable for the year under review).
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (not applicable for the year under review).
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; (not applicable for the year under review).
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (registrars to an issue and Share Transfer Agent) Regulations, 1993, regarding act and dealing with client.

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





NITESH CHAUDHARY & ASSOCIATES

PRACTICING COMPANY SECRETARY

(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:

S. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines Including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/ Show Cause notice/ Warning, etc)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remark
1	Regulation 23(9) Non-compliance with the Related Party Transaction on Consolidation basis	Regulation 23(9)	Discrepancy in Disclosure for Related Party transaction for the Quarter ended 30 th September, 2023 regarding the non-filing of XBRL for Disclosure within the same day of filing the PDF file alongwith Un-audited Financial results for the Quarter ended 30 th September, 2023	BSE	Clarification Letter /Fine	Non-Compliance with respect to delay of 1 day in filing XBRL for related party transaction.	5900 /- including gst	As per the Information given by the company, there is a delay of 1 day for filing related party transaction for the quarter ended 30 th September, 2023 in XBRL mode. . As per the received information, clarification submitted by the Company to BSE Ltd. BSE levied a penalty of Rs. 5000 + gst	Company has paid the penalty amount.	-

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

S. No.	Compliance Requirement (Regulations/ Circulars/ Guidelines Including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/ Show Cause notice/ Warning, etc)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remark
1	Regulation 17(1) of SEBI (LODR) Regulation, 2015	Regulation 17(1)	The Company has received a notice from BSE that the Company has made Non-compliance with the requirements pertaining to the Composition of the Board i.e. Number of Directors on the	BSE	Clarification / Fine	Non-compliance with the requirement i.e. Number of Directors on the Board of Prismx Global Ventures Ltd is 5 which is less than 6, due to as on 31 st March, 2022 entered into top 2000 list of	35,400 /- Including GST	As per the information given by the company, the company has submitted its clarification letter and waiver application. However the BSE Ltd has revoked the Waiver application and Imposed the penalty of Rs. 35,400/- including GST.	The Management of the company informed that the Company Paid the fine amount of Rs. 35,400/- including GST to the BSE Ltd.	-

Office Address: 204, Chetak Chamber, 13-14 RNT Marg, Near Dawa Bazar, Indore
Mumbai office: B - 614 Crystal Plaza, Opposite Infinity Mall, New Link Road, Andheri (W), Mumbai - 400053
Email: csniteshchaudhary@gmail.com; Website: www.csniteshchaudhary.com
Mob. No. +91 86554 56923; +91 76669 91644





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		Board of Prismx Global Ventures Ltd is 5 which is less than 6.			Companies			
Regulation 23(9) of SEBI(LODR) Regulation, 2015	Regulation 23(9)	Non-compliance with disclosure of related party transaction on consolidated basis	BSE	Waiver application/Clarification Letter	Non Compliance with Disclosure of Related Party transaction on consolidated basis and BSE imposed penalty of Rs. 1,77,000/- including GST	177000/- including GST	As per the information given by the company, there is Non-compliance with Disclosure of Related Party transaction on consolidated basis. BSE Ltd. imposed penalty of Rs. 177000/- including GST on company, accordingly company file the waiver application for waive of penalty. As per the received information BSE Ltd. did not waive the penalty and company paid the above fine amount to BSE.	The management of the company informed that the Company has complied with the disclosure of Related Party transaction within the time limit and the Company has also informed that the Clarifications and waiver application in this respect has been filed with the reasons by the Company with Stock exchange. The Stock Exchange imposed the penalty of Rs. 1,77,000/- and the same is paid by the Company.

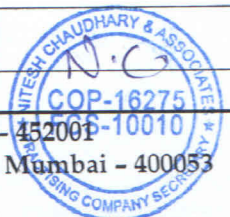
The additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of the BSE Circular reference No. 20230410-41 dated; April 10, 2023, are given in the attached Annexure.

Annexure

Additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of BSE Circular reference no. 20230410-41 dated: April 10, 2023:

Sr. No.	Particulars	Compliance Status Yes/No/NA	Remarks by PCS
1.	Secretarial Standards: The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the ICSI, as notified by the CG under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Satisfactory
2.	Adoption and timely Updation of the Policies: 1. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities 2. All 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 Yes	Satisfactory
3.	Maintenance and disclosures on Website:		

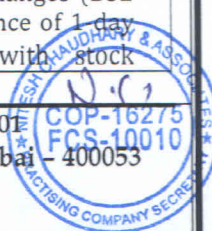
Office Address: 204, Chetak Chamber, 13-14 RNT Marg, Near Dawa Bazar, Indore - 452001
Mumbai office: B - 614 Crystal Plaza, Opposite Infinity Mall, New Link Road, Andheri (W), Mumbai - 400053
Email: csniteshchaudhary@gmail.com; Website: www.csniteshchaudhary.com
Mob. No. +91 86554 56923; +91 76669 91644





NITESH CHAUDHARY & ASSOCIATES
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	<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	Satisfactory
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	Satisfactory
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a). Identification of material subsidiary companies b). Disclosure requirement of material as well as other subsidiaries	Yes	Satisfactory
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	Satisfactory
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	Satisfactory
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 NA	Satisfactory No such cases observed
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	Satisfactory
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	Satisfactory
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	Yes	Action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (BSE Ltd.) for non-compliance of 1-day delay submissions with stock





NITESH CHAUDHARY & ASSOCIATES
PRACTICING COMPANY SECRETARY

	through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder except as provided under separate paragraph herein (**).		exchange under Regulation 23(9) Non-compliance with the Related Party Transaction on Consolidation basis, therefore the BSE Ld. Has imposed Rs. 5900/- SOP fines on the company, the company has paid the fine to BSE Ltd.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.

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)	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 such cases were observed during the review period.
	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	NA	
	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.	NA	
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 listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b). In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with	NA	No such cases were observed during the review period.





NITESH CHAUDHARY & ASSOCIATES
PRACTICING COMPANY SECRETARY

	<p>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> <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.	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 cases were observed during the review period.

Date: 30/05/2024

For Nitesh Chaudhary & Associates
Practising Company Secretary



Nitesh Chaudhary, Proprietor
Mem. No FCS: 10010
COP No: 16275
UDIN: F010010F000503338