



Date: 21/05/2022

<p>The Head- Listing Compliance <b>BSE Limited,</b> Phiroze Jeejeebhoy Towers, Dalal Street, Fort Mumbai- 400001</p> <p><b>Security Code: 511611</b></p>	<p>The Head- Listing Compliance <b>National Stock Exchange of India Ltd.</b> Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex Mumbai - 400 051</p> <p><b>Stock Code: DCMFINSERV</b></p>	<p>The Manager <b>The Calcutta Stock Exchange Ltd.</b> 7, Lyons Range, Murgighata, BBD Bagh, Kolkata, West Bengal- 700001</p> <p><b>Scrp Code: 014032</b></p>
--	--	---

**Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022**

Dear Sir/Ma'am,

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report as issued by M/s. Ojha & Associates, Company Secretaries (ACS No. 29658), for the year ended 31<sup>st</sup> March, 2022.

You are requested to take the same on record.

Thanking you.

Yours Faithfully,

**For DCM Financial Services Limited**

**KAUSHAL  
KASHYAP**

Digitally signed by KAUSHAL KASHYAP  
DN: cn=K. Kashyap,  
2.5.4.20=0170a0f96389515430148b17a669060b4252445a,  
7022a0b1a0000208f23\_p0000000=110001\_0000=011100,  
5, Block 5, Kirti Pur, Patparganj, East Delhi,  
India, o=Ojha & Associates, ou=Company Secretaries,  
serialNumber=0493669705744949366954732051b0c3a7,  
dnQualifier=0493669705744949366954732051b0c3a7,  
KAUSHAL  
KASHYAP  
Date: 2022.05.21 17:02:21 +05'30'

**(Kaushal Kashyap)**

**Director**

**DIN: 07683753**

**Place: New Delhi**

Encl: as stated

**DCM FINANCIAL SERVICES LIMITED**

CIN: L65921DL1991PLC043087

Regd. Office: D 7/3, Okhla Industrial Area-II, New Delhi-110020

Tel-011-26387750

email ID: info@dfsionline.com

Website: www.dfsionline.com



**Secretarial Compliance Report of DCM Financial Services Limited for the year ended March 31, 2022**

We, **Ojha & Associates**, have examined:

- (a) all the documents and records made available to us and explanation provided by **DCM Financial Services 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, 2022** (“**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 (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 said review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the said review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for the said review period**



## OJHA & ASSOCIATES

Company Secretaries

473, Patel Nagar, P.O. Harjinder Nagar, Kanpur-208007

E-Mail: [cstanayojha@gmail.com](mailto:cstanayojha@gmail.com), Ph. +91-9198069316

- (g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013;**Not Applicable for the said review period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 as applicable;

and circulars/ guidelines issued thereunder; and based on the above examination, We 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 records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ 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:

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations/ Remarks of the Practicing Company Secretary, if any.</b>
1	<b>NIL</b>			

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

**OJHA & ASSOCIATES**

Company Secretaries

473, Patel Nagar, P.O. Harjinder Nagar, Kanpur-208007

E-Mail: [cstanayoiha@gmail.com](mailto:cstanayoiha@gmail.com), Ph. +91-9198069316

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended March 31, 2022</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
<b>1.</b>	Regulation 17(1)(c) of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015- <i>The board of directors of the top 1000 listed entities (with effect from April 1, 2019) and the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.</i>	The Composition of the Board of Directors of the Company was not as per the requirement of the Regulation for quarter ended 30 <sup>th</sup> June 2020 & 30 <sup>th</sup> September 2020	The company had appointed Mr. Sanjay Sahni (Non-Executive Independent Director) & Mr. Kaushal Kashyap (Non-Executive Director) w.e.f. 01 <sup>st</sup> September, 2020 and the Company has made an application for Waiver of Penalty which was duly accepted by the Exchange and NSE has waived off the fine imposed vide their email dated 10.03.2022	The company had appointed Mr. Sanjay Sahni (Non-Executive Independent Director) & Mr. Kaushal Kashyap (Non-Executive Director) w.e.f. 01 <sup>st</sup> September, 2020 to comply with the said requirement.
<b>2.</b>	Regulation 23(9) of	The Company had not	The Company	The Company

**OJHA & ASSOCIATES**

Company Secretaries

473, Patel Nagar, P.O. Harjinder Nagar, Kanpur-208007

E-Mail: [cstanayojha@gmail.com](mailto:cstanayojha@gmail.com), Ph. +91-9198069316

	SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015- <i>[The listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website.]</i>	submitted disclosures of related party transactions on a consolidated basis within 30 days from the date of publication of its standalone and consolidated financial results for the half year ended 30 <sup>th</sup> September, 2020	had submitted the said disclosure on 20.01.2021 and made an application for Waiver of Fine imposed by National Stock Exchange of India Limited which was duly approved by the Exchange vide their letter dated May 20, 2021	had submitted the said disclosure on 20.01.2021 & made the compliance good
3.	Regulation 23(9) of SEBI(Listing Obligations and Disclosure Requirements) Regulations, 2015- <i>[The</i>	The Company had not submitted disclosures of related party transactions on a consolidated basis within	The Company had submitted the said disclosure on 20.01.2021 and made an application	The Company had submitted the said disclosure on 20.01.2021 & made the

**OJHA & ASSOCIATES**

Company Secretaries

473, Patel Nagar, P.O. Harjinder Nagar, Kanpur-208007

E-Mail: [cstanayojha@gmail.com](mailto:cstanayojha@gmail.com), Ph. +91-9198069316

	<i>listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website.]</i>	30 days from the date of publication of its standalone and consolidated financial results for the half year ended 30 <sup>th</sup> September, 2020	for Waiver of Fine imposed by the BSE Limited which was duly approved by the Exchange vide their letter dated June 25, 2021	compliance good
--	---	--	---	-----------------

**Date:21.05.2022****Place: Kanpur****For Ojha & Associates,  
Company Secretaries****Tanay Ojha**Digitally signed by Tanay  
Ojha  
Date: 2022.05.21  
16:18:56 +05'30'**Tanay Ojha  
Company Secretary  
Membership No.: A29658  
C.O.P. No.: 10790****UDIN: A029658D000361781**