

**JINDAL LEASEFIN LIMITED**

110, BABAR ROAD, (Opp. World Trade Centre)
NEW DELHI - 110 001 INDIA • CIN : L74899DL1994PLC059252
TEL. : 91-11-46201000 FAX : 91-11-46201002
E-mail : jindal@jindal.bz
Website : www.jindal.bz

May 28, 2022

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

Scrip Code: 539947

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended on 31st March, 2022

In compliance of Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read along with Clause 3(b)(iii) of the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 we are enclosing herewith an Annual Secretarial Compliance Report of the Company for the Financial Year ended on 31st March, 2022.

You are requested to take the above information on records.

Thanking You
Yours Faithfully

For Jindal Leasefin Limited

Shivani Gupta
Company Secretary & Compliance Officer

TP Twinkle Pandey
(TP & ASSOCIATES)

SECRETARIAL COMPLIANCE REPORT OF JINDAL LEASEFIN LIMITED FOR
THE YEAR ENDED ON 31ST MARCH, 2022

To,

The Board of Directors
Jindal Leasefin Limited
L74899DL1994PLC059252
110, Babar Road, New Delhi-110001

I CS Twinkle Pandey (Proprietor of TP & Associates) have examined:

- (a) all the documents and records made available to me and explanation provided by Jindal Leasefin 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 on 31st March, 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;

Registered office: 9/35, A-ZONE, HOSTEL AVENUE, NEAR ZOOM INTERNATIONAL SCHOOL,
DURGAPUR – 713204; EMAIL ID: twinklepandeyassociates@gmail.com; contact: 9073960964



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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable during the year under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the year under review**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable during the year under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (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 to the extent of securities issued;
- (k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.

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, except in respect of matter specified below:-



TP Twinkle Pandey
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Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<p>Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>The listed entity shall maintain a functional website and disseminate the information as required as per Regulation 46(2) of the Regulation</p>	<p>Not mentioned require information on website as required under Regulation 46(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</p>	<p>During the year under review, it has been observed that the Company has not mentioned require information on its website as required as per Regulation 46(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</p>
2.	<p>Regulation 31 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.</p>	<p>100% Shareholding of the Promoter and Promoter group is not in dematerialised form.</p>	<p>During the year under review, it has been observed that the Company has not maintained 100% of its promoter and Promoter Group Shareholding in dematerialisation form.</p>

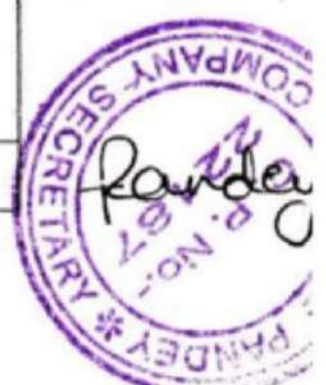


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3.	<p>Regulation 31 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-</p> <p>(a) documents whose preservation shall be permanent in nature ;</p> <p>(b) documents with preservation period of not less than eight years after completion of the relevant transactions:</p>	No Policy is being maintained by the Company on preservation of documents.	During the year under review, it has been observed that the Company has not maintained any policy for preservation of documents.
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- (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 examination of those records.
- (c) The company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company. (After discussion with the same, the Management has confirmed that they have complied with the same)
- (d) 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
			No Action Taken	



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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	<p>Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015:</p> <p>The listed entity shall maintain a functional website and disseminate the information as required as per Regulation 46(2) of the Regulation</p>	2020-21	No Action Taken	The Company has not taken any action on maintaining website of the Company.

Thanking You
Yours Sincerely

Twinkle Pandey
Twinkle Pandey
(TP & ASSOCIATES)
Practicing Company Secretary
Membership No.: A49208
C.P. No: 22187



Date: 28.05.2022
Place: Durgapur

Peer Review Certificate No.: 2088/2022
UDIN: A049208D000417521

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