

**Escorts Finance Limited**

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E-mail : escortsfinance@escorts.co.in  
Website : www.escortsfinance.com  
CIN : L65910CH1987PLC033652



June 30, 2021

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

**BSE – 511716**

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021**

Dear Sirs,

In terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2021, issued by M/s Jayant Gupta & Associates, Practicing Company Secretaries. We request you to kindly take the same on record.

Thanking you

Yours truly,  
For Escorts Finance Limited

**Vicky Chauhan**  
**Company Secretary**



**Encl: as above**

**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF ESCORTS FINANCE LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

I, Jayant Gupta, Practicing Company Secretary have examined:

- all the documents and records made available to us and explanation provided by **Escorts Finance Limited** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 2021 ("Review Period") in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

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



The Annual Listing Fee for the year 2020-21 was paid by the Company electronically to BSE Limited on 21<sup>st</sup> November, 2020. The extended due date for payment of Listing Fee was 30<sup>th</sup> June, 2020 and the Company made payment to BSE Limited through cheque in July 2020. However, due to prevailing COVID restrictions in Mumbai, BSE Limited failed to encash the listing fee cheque within its validity and requested the Company to make payment electronically.

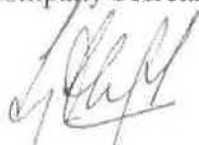
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under Standard Operating Procedures issued by SEBI through various circulars) under aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder: **NOT APPLICABLE**
- (d) 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 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 19(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	One of the Directors of the Nomination and Remuneration Committee is an executive Director.	The Company has appointed a Non-Executive Director as a Member on 26 <sup>th</sup> July, 2019 after cessation of Mr. Pritam Narang, Executive Director as member	The committee composition is as per the regulation after the induction of Mr. Vinod Dixit, Non-Executive Director, as a Member of the Committee w.e.f. 26 <sup>th</sup> July, 2019. No further comments.
2	Disclosure under Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The disclosure of Related Party Transactions for the half year ended 31st March, 2019 was filed on 27 <sup>th</sup> June, 2019 i.e. 23 days after the due date. The financial results were published on 5 <sup>th</sup> May, 2019.	Complied with	No further comments



3	Disclosure under Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The disclosure of Related Party Transactions for the half year ended 30 <sup>th</sup> September, 2019 was filed on 2 <sup>nd</sup> December, 2019 i.e. 1 day after the due date. The financial results were published on 1 <sup>st</sup> November, 2019.	Complied with	No further comments
4	Payment of fee and other charges as per Regulation 14 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The annual Listing fee payment was made on 9 <sup>th</sup> July, 2019 i.e. with a delay of 2 months and 9 days.	Complied with	No further comments

For Jayant Gupta & Associates  
Company Secretaries




FCS No.:7288  
C P No.: 9738  
PR : 759/2020  
UDIN: F007288C000553977

Place: New Delhi  
Date: 30th June, 2021