

June 27, 2021

The General Manager,  
Department of Corporate Services,  
BSE Limited  
Phiroze Jeejeeboy Towers,  
Dalal Street, Mumbai – 400001.

Scrip Code: 540268

Dear Sir / Madam,

**Subject: Annual Secretarial Compliance Report for the Year Ended March 31, 2021.**

**Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and  
SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021**

In terms of Clause 3 (b) (iii) of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 read with SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by Bhandari & Associates, Practicing Company Secretaries.

We request you to kindly take the above on record.

Thanking you.

Yours faithfully,

**For Dhanvarsha Finvest Limited**



**Fredrick Pinto**  
Company Secretary  
ACS-22085



## **BHANDARI & ASSOCIATES**

Company Secretaries

901, Kamla Executive Park, Off. Andheri Kurla Road,  
J. B. Nagar, Andheri East, Mumbai- 400 059  
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### **Secretarial Compliance Report of Dhanvarsha Finvest Limited for the year ended March, 31, 2021**

*[Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with SEBI Circular  
CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019]*

We, Bhandari & Associates, Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **Dhanvarsha Finvest 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, 2021** ("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;#
- 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; #



- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;#
- 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 circulars/ guidelines issued thereunder.

# The Regulations or Guidelines, as the case may be were not applicable for the period under review.

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, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- 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 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:

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.
1.	BSE Ltd.	As per Regulation 23(9) of SEBI Listing Regulations, 2015, there was delay on part of the listed entity in submitting disclosures of related party transactions for half-	A fines as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/20 20/12 dated January 22, 2020 was levied by the BSE on the	The listed entity has paid the fine with BSE Ltd.



		year ended 30 <sup>th</sup> September, 2020 to the Stock Exchange.	Company vide their email dated January 18, 2021 and February 05 2021.		
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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... (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
None				

For Bhandari & Associates  
Company Secretaries

*Manisha*

Manisha Maheshwari  
Partner



ACS No: 30224; C P No. : 11031  
Mumbai | June 26, 2021  
UDIN: A030224C000522694