

THE FIRST CUSTODIAN FUND (INDIA) LTD.



CORPORATE OFFICE : SURYA MAHAL 3RD FLOOR, NAGINDAS MASTER ROAD, FORT, MUMBAI-400 023. INDIA
PHONE : 6635 9001 • 6635 9002 • FAX: +9122-2270 3539 • CIN : L67120WB1985PLC038900

Date: 14th August, 2019

To,
The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 511122

**SUB: NOTING AND RESPONSE BY THE BOARD IN RESPECT OF NOTICE
DATED 14TH MAY, 2019 RECEIVED FROM BSE LTD. FOR NON-APPOINTMENT
OF COMPANY SECRETARY AS COMPLIANCE OFFICER**

Dear Sir / Madam,

The Board Meeting of the Company was held on 14th August, 2019. The Chairman of the Meeting has placed before the Board the Notice No. LIST/COMP/511122/Reg.6(1)-Mar-19/50/2019-20 dated 14th May, 2019 received from BSE Ltd. imposing fine of Rs. 90,000/- + 18% GST for non-appointment of Company Secretary as Compliance Officer of the Company as per Reg. 6(1) of the SEBI (LODR) Regulations, 2015 along with the reply filed on 16th May, 2019 requesting waiver of the said fine. The BSE Ltd. has rejected the request for waiver of fine.

The Board discussed, noted and provided the following response:

'The Company is exempted from Chapter IV in respect of Corporate Governance regulations. The Company is complying with other applicable regulations of SEBI (LODR) Regulations, 2015, SEBI (SAST) Regulations, 2011 and the provisions of Companies Act, 2013. Due to exemption from the regulations of Corporate Governance, the work profile of the Company Secretary is minimal. The nature of the business of the Company is Share Broker and is a Member of National Stock Exchange of India Limited.

The Company has approached through WIRC Office of ICSI to fill the vacancy of Company Secretary. In response to this, the Company has not received any response from any candidates.

Ours is small company having paid-up capital of Rs. 1.5 Crores. There is no growth prospect for the Company Secretary and the job profile is not attractive.

In the circumstances, it is very difficult for the Company to secure any Company Secretary. The Company ensures to continue the efforts of searching Company Secretary.

Also the Company will ensure that other than non-appointment of Company Secretary as Compliance Officer, there will be no non-compliance or any delay in compliance of the Corporate Governance regulations and quarterly listing compliance.'

Please take the aforesaid on your records and acknowledge the receipt.

Thanking You,

Yours Faithfully,

For **THE FIRST CUSTODIAN FUND (INDIA) LIMITED**



**GIRIRAJ DAMMANI
MANAGING DIRECTOR**