

EKAM LEASING AND FINANCE CO. LIMITED

REGD OFFICE: No. 11, Rani Jhansi Road, (Motia Khan), M M Road, New Delhi -110055 Tel No. : 011-23528015 Fax No. : 011-23528015

E-mail : ekam.leasing1@gmail.com, info@ekamleasing.com, Website : www.ekamleasing.com

CIN No.: L74899DL1993PLC055697

To,
Listing Department
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

Date: 30/05/2024

Script Code: 530581

Sub: Submission of Annual Secretarial Compliance Report for the Year ended March 31, 2024 under regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

Respected Sir/ Madam,

Pursuant to regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 , we are enclosing herewith "Annual Secretarial Compliance Report" of the company for the Year ended March 31, 2024 issued by M/s KKS & Associates, Practicing Company Secretary for your kind perusal.

This is for your information and records.

Thanking You

For Ekam Leasing and Finance company Limited

Rakesh Jain
Digitally signed
by Rakesh Jain
Date: 2024.05.30
19:33:18 +05'30'

Rakesh Jain
Chairman Cum Managing Director

Encl: as above



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
M/S EKAM LEASING AND FINANCE CO. LIMITED
(CIN: L74899DL1993PLC055697)
FOR THE YEAR ENDED 31st MARCH, 2024**

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and further by BSE Notice No. 20230316-14 dated March 16, 2023]

We have examined:

- all the documents and records made available to us and explanation provided by M/s Ekam Leasing And Finance Co. 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 31st March, 2024 ("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 *(Not Applicable since there were no events requiring compliance during the Review Period)*;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 *(Not Applicable since there were no events requiring compliance during the Review Period)*;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 *(Not Applicable since there were no events requiring compliance during the Review Period)*;




(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable since there were no events requiring compliance during the Review Period)**;

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Other regulations as applicable;

and circulars/ guidelines issued thereunder;

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 matters specified below-**ENCLOSED AS ANNEXURE-A**

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: **ENCLOSED AS ANNEXURE-B.**

(c) I/We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the Policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	None None



3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance report under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>None</p> <p>None</p> <p>None</p>
4	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	<p>Yes</p>	<p>None</p>
5	Details related to Subsidiaries of listed entities have been examined w. r. t : (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	<p>N/A</p>	<p>The Listed entity does not have any Material Subsidiary. The Listed entity have following wholly owned subsidiaries: 1. Jet Air Securities Private Limited 2. Rex Overseas Private Limited 3. S & S Balajee Mercantile Private Limited</p>
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI (LODR) Regulations, 2015.	<p>Yes</p>	<p>None</p>
7	Performance Evaluation: The listed entity has conducted performance evaluation of the Board,	<p>Yes</p>	<p>None</p>



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	Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.		
8	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	<p>Yes</p> <p>NA</p>	None
9	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure (s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	None
10	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder except as provided under separate paragraph herein (**).</p>	Yes	BSE has imposed fine in terms of SEBI CIRCULAR NO.SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 Company has filed Clarification letter in this regard.
12	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p>	NA	There was no event of resignation of



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	In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		statutory auditors from the Company.
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	1. It is observed that the composition of Nomination and remuneration committee was not as specified under SEBI (LODR) 2015. 2. The Listed entity does not have Chief Financial Officer from 02/05/2022. 3. The post of Company Secretary is lying vacant from 03/10/2023.

Assumptions & Limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: New Delhi

Date: 30.05.2024

UDIN: F008493F000501898

Peer Review: 2105/2022



For KKS & Associates
Company Secretary

[Signature]
Krishna Kumar Singh
Proprietor

M. No. 8493

COP No: 9760

ANNEXURE-A

S. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken By	Type of action	Details of Violation	Fine Amount (Rs.)	Observations/Remarks of the Practicing	Management Response	Remarks
1	Non-submission of the financial results within the period prescribed under this regulation	Regulation 33 of SEBI (LODR) 2015	3 days delay in Submission of financial results for the quarter ended September 2023	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/P oD2/CIR/P/2023 /120 dated July 11, 2023	Delay in Submission of financial results for the quarter ended September 2023 in XBRL.	17,700	Clarification letter Filed with BSE.	Delay due to "OTP Verification failed" on BSE portal, however same was sent /intimated through email to BSE	No further communication from BSE



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ANNEXURE-B

S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken By	Type of action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing	Management Response	Remarks
1	Submission of Shareholding pattern	Regulation 31 of SEBI (LODR) 2015	7 days delay	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Delay due to non-availability of data from RTA	14160	Delay in Submission of Shareholding pattern for the quarter ended on December 2021		
2	Submission of Shareholding pattern	Regulation 31 of SEBI (LODR) 2015	26 days delay	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Delay due to non-availability of data from RTA	61360	Delay in Submission of Shareholding pattern for the quarter ended on June 2022		



3	Composition of the Board including appointment of Woman Director.	Regulation 17(1) of SEBI (LODR) 2015.	90 days delay	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Due to Covid 19, the Company has lost its two directors, one of whom was independent director and another was women director and board was going through mental agony was not able to find someone eligible to fill the vacancy	531000	Default in respect of Requirements pertaining to the composition of the Board including failure to appoint Woman Director for the quarter ended on March 2022	Application for waiver of fine and unfreezing of promoter demat account has been filed. Application for waiver of fine and unfreezing of promoter demat account has been filed.	Waiver Application pending for consideration with BSE
4	Submission of financial result.	Regulation 33 of SEBI (LODR) 2015	1 day delay	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Due to technical issue with the portal	5900	Submission of financial result for the quarter ended on March 2022		
5	Statement on shareholder	Regulation 33 of SEBI	26 days delay	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO.	Delay due to non-	30680	Delay in Submission of Statement on shareholders		



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8	Reconciliation of Share Capital audit report	Regulation 76 of SEBI (Depositors & Participants) Regulation 2018	136 days	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Delay was due non-availability of data from RTA	-	Delay in submitting the Reconciliation of Share Capital audit report for quarters ended on June 2022	as compliance officer.	
9	Reconciliation of Share Capital audit report	Regulation 76 of SEBI (Depositors & Participants) Regulation 2018	90 days	BSE	Penalty imposed in pursuant to SEBI CIRCULAR NO. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	Delay was due non-availability of data from RTA	-	Delay in submitting the Reconciliation of Share Capital audit report for the quarters ended on September 2022		

