



# LIBORD FINANCE LIMITED

104, M. K. Bhavan, 300, Shahid Bhagat Singh Road, Fort, Mumbai - 400 001.

Tel.: (022) 2265 8108 / 09 / 10 • Fax : (022) 2266 2520

Email : office@libord.com • Website : www.libord.com

CIN No.: L65990MH1994PLC077482

Date: May 27, 2022

To  
Department of Corporate Services,  
BSE Ltd.  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai – 400001

Dear Sir/ Madam,

**Sub.: Annual Secretarial Compliance Report for the year ended March 31, 2022**

**Ref: Scrip Code No. 511593**

In pursuance to 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 the Annual Secretarial Compliance Report for the year ended March 31, 2022.

This is for your kind information and necessary records.

Thanking You,

Yours faithfully,

For Libord Finance Limited

**Dinker Mishra**  
**Company Secretary & Compliance Officer**

Encl: As Above

SHEETALKUMAR DAK  
B.Com, FCA, FCS  
S. DAK & ASSOCIATES  
Flat No.6, Konark Villa,  
Behind Gopal Cultural Hall,  
New Osmanpura,  
Aurangabad-431005.  
Mob No.9225334541  
Mail Id: [skdak@rediffmail.com](mailto:skdak@rediffmail.com)

**SECRETARIAL COMPLIANCE REPORT AS PER REGULATION 24(A) OF SEBI (LODR) 2015 OF LIBORD FINANCE LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

We, S. DAK & Associates, have examined:

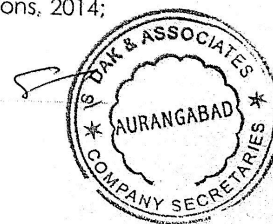
- a) all the documents and records made available to us and explanation provided by Libord Finance Limited ("the listed entity");
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which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

for the year ended 31<sup>st</sup> 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; (Not applicable to the listed entity during the Review Period)
- 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; (Not applicable to the listed entity during the Review Period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the Review Period)



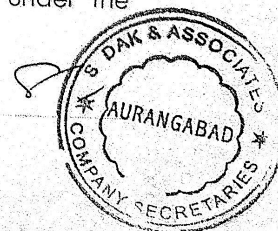
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the listed entity during the Review Period)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.

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
1	Regulation 17(1) of SEBI (LODR) Regulations, 2015 in the June Quarter, 2021	Appointment of one more Independent Director was required to be made in terms of the said Regulation	According to the clarification given by the management the Company was in compliance with Regulation 17(1)(a) having two Independent Directors and an optimum combination of Executive and Non-Executive Directors with at least one-woman director and more than fifty percent of the Board of Directors comprised of non-executive directors. However, one more Independent Director was required to be appointed in terms of Regulation 17(1)(b) of SEBI (LODR) Regulations, 2015. The Company was not able to appoint one more independent director due to Covid-19 pandemic and other reasons. However, the Members of the Company have appointed one more Independent Director in the succeeding Quarter in the 27 <sup>th</sup> AGM of the Company with effect from 24.08.2021 in due compliance of the said Regulation.

- 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 Limited	Regulation 17(1) of SEBI (LODR) Regulations, 2015	Fine	The Company was in compliance of Regulation 17(1)(a) however one more independent director was required to be appointed under Regulation 17(1)(b) of SEBI (LODR) Regulations, 2015 in the June Quarter, 2021 which the company has duly complied in the succeeding quarter, (September 2021) with effect from 24 <sup>th</sup> August, 2021.

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
Not applicable				

Place: Aurangabad  
Date: 27/05/2022  
UDIN: F003100D000403423

For S. DAK & Associates  
Company Secretaries

  
Sheetalkumar Dak

Proprietor

FCS- 3100

CP No - 7687

Peer Review No. 2020/2022

