



# DECILLION FINANCE LIMITED

Regd. Off: "JAJODIA TOWER", 4TH FLOOR, ROOM NO. D-8, 3, BENTINCK STREET, KOLKATA - 700 001  
PHONE : (O) 2248 5664, 2243 9601, E-MAIL : info@decillion.co.in WEBSITE : www.decillion.co.in  
CIN : L65999WB1995PLC067887

Date: 16/05/2022

To,  
The Secretary,  
Listing Department  
BSE Limited,  
P.J. Towers, Dalal Street,  
Mumbai - 400 001

To,  
The Secretary,  
Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata-700001

Scrip Code: 539190

Scrip Code: 013097

Sub: Submission of Annual Secretarial Compliance Report for the Year Ended 31<sup>st</sup> March, 2022

Dear Sir/Madam,

Pursuant to the Regulation 24A of Securities and Exchange Board of India (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 of Decillion Finance Limited for the year ended 31<sup>st</sup> March, 2022 as issued by Mr. Rajesh Ghorawat, Practicing Company Secretary.

This is for your information and records.

Thanking you,

Yours faithfully,  
**For Decillion Finance Limited**

*Ishu Maskara*

**Ishu Maskara**  
**Company Secretary & Compliance Officer**

Encl: As above

# **RAJESH GHORAWAT**

## **PRACTISING COMPANY SECRETARY**

**68, R. K. CHATTERJEE ROAD,  
KASBA BAKULTALA, 3<sup>RD</sup>FLOOR,  
KOLKATA-700042  
MOBILE- 9836029000  
Email [Id-rgadvisory18@gmail.com](mailto:Id-rgadvisory18@gmail.com)**

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### **ANNUAL SECRETARIAL COMPLIANCE REPORT OF DECILLION FINANCE LIMITED FOR THE YEAR ENDED MARCH 31, 2022**

To  
**Decillion Finance Limited**  
Jajodia Tower  
3, Bentinck Street,  
4<sup>th</sup> Floor, Room No. D-8,  
Kolkata - 700001

I, Rajesh Ghorawat, Practicing Company Secretary have examined:

- a) all the documents and records made available to me and explanation provided by **Decillion 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 March 31, 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, **to the extent of Acts/ Provisions of the Acts applicable to the company**, 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 Company during the review period*)

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- 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 Company during the review period*)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*Not Applicable to the Company during the review period*)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (*Not Applicable to the Company 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 Company during the review period*)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulation, 1993

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: -

<b>Sr. No.</b>	<b>Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)</b>	<b>Deviation</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1.	Non-compliance of Regulation 13(3) of SEBI (LODR)	The company has complied with the said regulation; however,	It was not a case of non-compliance of Regulation 13 as stated

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	<p>Regulation, 2015 for the quarter ended June 2021.</p>	<p>the said compliance document under regulation 13(3) was erroneously uploaded on the CSE Portal under the document ID 23.1 instead of 17.1.</p>	<p>by the CSE Limited. It was merely a clerical error whereby the same was wrongly uploaded under different head of the same regulation.</p> <p>Further, the Company had served a mail dated 04-01-2022 to CSE Limited informing the error and sought waiver off fine levied in this connection with proper acknowledgements evidencing that the compliance was done on time and accordingly, CSE Limited vide its mail dated 10-01-2022 informed the company that the fine was removed and the matter was closed.</p>
2.	<p>Non-Compliance of Regulation 34 of SEBI (LODR) Regulation, 2015 for the Financial Year 2020-21.</p>	<p>The CSE Limited through their Portal informed the Company about Non-Compliance of Regulation 34 of SEBI (LODR) Regulation, 2015. As per CSE Limited the Company had failed to upload the Annual Report on time.</p>	<p>The Company had served a mail dated 15-03-2022, stating in brief the matter to CSE Limited that the company had served the copy of Annual Report in Compliance with Regulation 34 of SEBI (LODR) Regulation, 2015 through the designated E-Mail ID <a href="mailto:listingcompliance@cse-india.com">listingcompliance@cse-india.com</a> and requested to waive off the fine levied on the company. The matter is still under</p>

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			consideration/pending with CSE Limited.
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- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my 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 Violations	Details of action taken E.g., Fines, Warning Letter, Debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any.
1.	CSE	Erroneously uploaded on the CSE Portal under the document ID 23.1 instead of 17.1 pursuant to the Regulation 13 of SEBI (LODR) Regulations, 2015 for the quarter ended June 2021	The CSE Limited prima facie levied a fine on the company for making non-compliance of Regulation 13(3) and further asked to provide supporting documents if the same compliance within time.	It was not a case of non-compliance of Regulation 13 as stated by the CSE Limited. It was merely a clerical error whereby the same was wrongly uploaded under different head of the same regulation.  Further, the Company had served a mail dated 04-01-2022 to CSE Limited informing the error and sought waiver off fine levied in this connection with proper supporting evidence that the compliance was done on time and accordingly, CSE Limited vide its mail dated 10-01-2022 informed the company that the fine was

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				removed and the matter was closed.
2.	CSE	Non-Compliance of Regulation 34 of SEBI (LODR) Regulation, 2015	The CSE Limited prima facie levied a fine on the company and further asked to provide supporting documents if the same compliance was done within time.	The Company had served a mail dated 15-03-2022, stating in brief the matter to CSE Limited that the company had served the copy of Annual Report in Compliance with Regulation 34 of SEBI (LODR) Regulation, 2015 through the designated E-Mail ID <a href="mailto:listingcompliance@cse-india.com">listingcompliance@cse-india.com</a> and requested to waive off the fine levied on the company. The matter is still under consideration/pending with CSE Limited.

d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising Company Secretary in the Previous Reports	Observation made in the Secretarial Compliance report for the year ended	Actions taken by the Listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	Delay in Compliance of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for	2021	The Company served a letter to BSE Limited via mail dated 28-01-2021 seeking waiver off penalty.	Pursuant to the decision of the committee after a review, the request for waiver of the fine has been approved via

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	the Half Year ended September, 2020			mail dated 13-08-2021.
2.	Non-compliance of Regulation 13(3), 27(2) and 31 of SEBI (LODR), 2015 for the quarter ended 31 <sup>st</sup> March, 2020	2021	The Company served a letter to BSE Limited and requested to take lenient view in this matter and also requested to waive off the penalty.	Pursuant to the decision of the committee after a review, the request for waiver of the fine has been approved via mail dated 25-01-2021, 29-09-2020 & 23-12-2020 respectively and the same was also reported in our last report dated 21-06-2021.



**Rajesh Ghorawat**  
**Practising Company Secretary**  
M.No. F7226  
CP No. 20897

Date: 11<sup>th</sup> May, 2022  
Place: Kolkata

ICSI Peer Review No.: 1992/2022  
UDIN: F007226D000304369