



Date: 27/05/2022

CORP. OFFICE: G-72, Ist FLOOR, KIRTI NAGAR, NEW DELHI - 110 015 TEL.: 45061917, FAX: 45061922 E-mail: compliance4arihant@gmail.com CIN: L65910GJ1995PLCO25312

To

The Head – Listing & Compliance

Metropolitan Stock Exchange of India Ltd. (MSEI)

Vibgyor Tower, 4th Floor, Plot No C-62,

G – Block, Opp. Trident Hotel

BandraKurla Complex

Bandra (E), Mumbai – 400098 (India)

Dear Madam/Sir

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

Please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022 as certified by M/s Saurabh Agrawal & Co., Practicing Company Secretary. This report has been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and records.

Yours Faithfully

For: ARIHANT CLASSIC FINANCE LIMITED

FOR ARIHANT CLASSIC FINANCE LTD.

Name: Ankita Kothari

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Designation: Chief Finance Officer

Encl.: As above



## SECRETARIAL COMPLIANCE REPORT OF ARIHANT CLASSIC FINANCE LIMITED FOR THE YEAR ENDED ON 31st MARCH, 2022

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## Arihant Classic Finance Limited

CIN: L65910GJ1995PLC025312 G-72, First Floor, Kirti Nagar Delhi-110015

We Saurabh Agrawal & Co., Practicing Company Secretaries have examined:

a. All the documents and records made available to us and explanation provided by the *Arihant Classic Finance Limited* ("The Company");

b. The filings/submissions made the listed entity to the Stock Exchange;

c. Website of the listed entity;

d. Any other documents/filing as may be relevant for the report/ certificate; For the year ended on 31st March, 2022 (**Review Period**) in respect of the 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 there under 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 Obligation 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 audit period;

c. Securities and Exchange Board of India (Substantial Acquisition of shares and Takeovers)Regulations, 2011;Not Applicable to the Company during the audit period;

d. Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018; Not

Applicable to the Company during the audit period;

e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; Not Applicable to the Company during the audit period;

f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; Not Applicable to the Company during the audit 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 audit period;

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;

j. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2009. Not applicable to the company during the review period



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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 the matters specified below:

SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015

Sr.	Compliance Requirement	Deviations	Observation/Remarks
No.	(Regulations/Circulars/guidelines		of Practicing
	including specific clause)	~	Company Secretary
1	Regulation 33 (3)(a) of SEBI	Listed entity has not	Company has
	(Listing Obligation and Disclosure	submitted quarterly	submitted the
	Requirement) Regulations, 2015	results for the quarter	financial result on 14th
		ended 30th June, 2021	August, 2021.
		within time.	
2	Regulation 24A of SEBI (Listing	Listed entity has not	Company has
	Obligation and Disclosure	submitted Annual	submitted the Annual
	Requirement) Regulations, 2015	Secretarial compliance	Secretarial compliance
		report within time.	on 17th July, 2021.

## SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr.	Compliance	Deviations	Observation/Re
No.	Requirement		marks of
İ	(Regulations/Circulars/		Company
	guidelines including		Secretary
	specific clause)		
1	Regulation 3(5)	The Company has not maintained the	-
	, -	structured digital database containing the	
		names of such person or entities as the case	
		may be with whom information is shared.	
2	Regulation 8	The Board of Directors of the Company	-
		has not formulated the a code of practices	
		and procedures for fair disclosures of	
-		unpublished price sensitive information.	
3	Regulation 9	The Board of Directors of the Company	-
		has not formulate the code of conduct to	
		regulate, monitor and report trading by its	
		designated persons and immediate	
		relatives of designated persons towards	
		achieving compliance with these	
		regulations.	

b) The listed entity has not maintained proper records under the provisions of the above regulations and circulars/guidelines issued thereunder insofar as it appears from my/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 Exchange (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 variation	taken e.g. fines,	
			warning letter debarment etc.	Practicing Company Secretary, if any
1.	Metropolita n Stock Exchange of India Limited (MSEI)	The listed entity has made delay in submission of audited consolidated financial results for the financial year ended on 31st March, 2021 within sixty days from the end of the financial year along with the audit report.	accounts of all the entities mentioned in the shareholding pattern and fine was levied for Rs.	The company has filed the financial results on 14th
2	Metropolita n Stock Exchange of India Limited (MSEI)	The listed entity has not submitted of Annual secretarial compliance report for the financial year ended on 31st March, 2021 within sixty days from the end of the financial year along with the audit report.	Freeze the demat accounts of all the entities mentioned in the shareholding pattern and fine was levied for Rs. 58,000/-	The company has filed the financial results on 17th July, 2021 as after due date. However Company has not paid the fine impose by MSEI the company has submitted request letter for the waiver of the fine with MSEI.

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

S. No	Observations of the	Observations made	Actions taken by	Comments of
•	Practicing	in the secretarial	the listed entity.	the Practicing
	Company Secretary	compliance report	ifany	Company
	in the previous	for the year ended	PROPER NO EXCEPT DESIGNATION AND ELECTRICAL PRODUCT A	Secretary on
		31st March, 2022	Expected at the control of the co	the actions
				taken by the
				listed entity
-	-	-	-	-

Date: 27/05/2022 Place: New Delhi

UDIN: F005430D000408613

For: Saurabh Agrawal & Co.

Company Secretaries

Saurabh Agra Partner CP No. 4868 FCS No. 5430