

## Saurabh Agrawal Co. Company Secretaries

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## SECRETARIAL COMPLIANCE REPORT OF ARIHANT CLASSIC FINANCE LIMITED FOR THE YEAR ENDED ON 31<sup>ST</sup> MARCH, 2021

To

## **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;

We do hereby declare that due to the outbreak of COVID-19 pandemic, we have not made any physical visit at the office of the Company. The Compliance Report is based on the information received from electronic mean.

For the year ended on 31st March, 2021 (**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; Not Applicable to the Company during the audit period;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities)
  Regulations, 2008; 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;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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.
- 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 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 | Details   | of | Details        | of   | Action  | Observations/r |
|---------|--------|-------|-----------|----|----------------|------|---------|----------------|
|         | by     |       | variation |    | taken          | e.g. | fines,  | emarks of the  |
|         |        |       |           |    | warning        |      | letter  | Practicing     |
|         |        |       |           |    | debarment etc. |      | Company |                |



|  | Secretary, if  |
|--|----------------|
|  | Not Applicable |

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    | if any             | Company<br>Secretary on       |
|       | in the previous     | for the year ended   |                    |                               |
|       | reports             | (The years are to be |                    | the actions                   |
| -     |                     | mentioned)           |                    | taken by the<br>listed entity |
|       |                     | Not Applicable       |                    |                               |

\*\* However the compliance officer cum company secretary of the company has resigned on 18th January, 2021.

Date: 17/07/2021 Place: New Delhi

UDIN: F005430C000649711

For: Saurabh Agrawal & Co.

Company Secretaries

Saurabh Partner

CP No. 4868

FCS No. 5430