



Roni & Associates
(Practicing Company Secretaries)

**Annual Secretarial Compliance Report
for the financial year ended 31st March 2024.**
{Pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015}

**ARIHANT CLASSIC FINANCE LIMITED
(CIN: L65910DL1995PLC431057)**

Registered Office: G-72, First Floor, Kirti Nagar, Delhi Industrial Area, West Delhi, New Delhi, India, 110015

I, Roni Soni, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **ARIHANT CLASSIC 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 Report.

for the year ended 31st March, 2024 ("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) The securities and exchange board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015.
- b) The securities and exchange board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. **Not applicable during the review period;**
- c) The securities and exchange board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not applicable during the review period;**

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- d) The securities and exchange board of India (Buyback of Securities) Regulation, 2018 - not applicable during the period under review; **Not applicable during the review period;**
- e) The securities and exchange board of India (Share based Employees Benefits and Seat Equity) Regulations, 2021 - **Not applicable during the period under review;**
- f) The securities and exchange board of India (Issue and Listing of Non-Convertible Securities) Regulation 2021- **Not applicable during the period under review;**
- g) The securities and exchange board of India (Prohibition of Insider Trading) Regulation, 2015.
- h) The securities and exchange board of India (Depositories and Participants) Regulation 2018.
- i) Other regulation as applicable.

and circulars/ guidelines issued thereunder;

I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	YES	
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All 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	

3.	<p>Maintenance and disclosures on Website:</p> <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 reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website 	YES	
4.	<p>Disqualification of Director:</p> <p>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	
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	
6.	<p>Preservation of Documents:</p> <p>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	
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	YES	

8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions;</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.</p>	YES	
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	
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>	No	<p>As verified from the records and confirmed by the Company, during the review period, The Company is in the process of Purchasing designated software and implementing a Structural Digital Database tool for Monitoring the UPSI.</p> <p>However presently, Company maintains such data manually, considering the small size of the Company and considering the NIL trading.</p>
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</p>	NA	<p>As verified from the records and confirmed by the Company, during the review period no action has been taken against the company by the SEBI or Stock Exchange(s).</p>

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

Sr. No.	Observations/Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended 31 st March 2024 (the years are to be mentioned)	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity

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 report 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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: DELHI
Date: 28.05.2024

FOR Roni & Associates
COMPANY SECRETARIES

Roni Soni
Proprietorship
M.NO.: F11600
C.PNO.: 21854
UDIN: F011600F000473633
PR. CERT NO.: 3471/2023