



**Annual Secretarial Compliance Report**  
**of M/s Aravali Securities and Finance Limited for the year ended 31<sup>st</sup> March 2021**

To  
The Board of Directors,  
Aravali Securities and Finance Limited  
Plot No. - 136, Fourth Floor, Rider House Sector-44  
Gurgaon, Haryana - 122003

Dear Sir/ Madam,

I, Sachin Kumar Shrivastva, Company Secretary in Practice, has examined:

- (a) all the documents and records made available to me and explanation provided by management of the Company "Aravali Securities and Finance Limited".
- (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 financial year ended on 31<sup>st</sup> March 2021 (Review Period) in the 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under 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 there under, 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;
- (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 on the Listed Entity during the period under review**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ( **not applicable on the Listed Entity during the period under review**);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 ( **not applicable on the Listed Entity during the period under review**);

- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 ( **not applicable on the Listed Entity during the period under review**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under;

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 there under, 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	As per Regulation 33 of the SEBI (Listing Obligation and Disclosure Requirements) regulations, 2015, The listed entity shall publish the Audited/unaudited financial results for each quarter within 45 days of the end of the quarter, other than last quarter along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.	Audited financial result for the 4th quarter ended on 31.03.2021 is not yet filed with stock exchange.	Relaxation Provided vides SEBI Circular No. SEBI/HO/CFD/CMD1/P/ CIR/2021/556 dated 29 <sup>th</sup> April 2021.
2	As per Regulation 47 of the SEBI (Listing Obligation and Disclosure Requirements) regulations, 2015, The listed entity shall publish the following information in the newspaper: (a) notice of meeting of the board of directors	Result for the 4 <sup>th</sup> quarter ended on 31.03.2021 not yet published in the news papers as required under Regulation 47 of LODR.	Relaxation Provided vides SEBI Circular No. SEBI/HO/CFD/CMD1/P/ CIR/2021/556 dated 29 <sup>th</sup> April 2021.

3	<p>where financial results shall be discussed,</p> <p>(b) financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor</p> <p>As per regulation 23(9) the SEBI (Listing Obligation and Disclosure Requirements) regulations, 2015, listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website</p>	<p>The Company has published the financial results for the half year ended on September 30, 2020 on 12.11.2020.</p> <p>However disclosures of related party transactions as required under regulation 23(9) is submitted to stock exchange on 20.01.2021.</p> <p>Disclosure under Reg. 23(9) for the half year ended on 31.03.2021 is not yet submitted with the stock exchange.</p>	<p>Relaxation Provided vide SEBI Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated 29<sup>th</sup> April 2021.</p>
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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 Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

Sr. No.	Action taken by	Details of Violation	Details of action take by i.e. fine, warning letter, debarment etc.	Observations/ Remarks of the Practicing Company Secretary
None				

(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 March 31, 2018.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable				



*Sachin*

Date: 28.05.2021  
Place: Vaishali

**Sachin Kumar Shrivastva**  
**(Company Secretary in Practice)**  
CP No. 21674  
UDIN: A055362C000383734