

**Secretarial Compliance Report of ANUPAM FINSERV LIMITED**  
**For the Year Ended 31st March 2020**

To,  
The Members,  
ANUPAM FINSERV LIMITED  
(Formerly Known As Vantage Corporate Services Ltd)

We have examined

- (i) All the documents and records made available to us and explanation provided by ANUPAM FINSERV LIMITED (The Company);
- (ii) The filings/submissions made by the listed entity to BSE LIMITED (the stock exchange where its Equity Shares are listed),
- (iii) Website of the listed entity,
- (iv) Any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31<sup>st</sup> March 2020** 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: -
- (v) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (vi) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment.
- (vii) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (‘SEBI Act’):
  - 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 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,

Add: A-504, 5th Floor, Parvati Apartment, Shankar Pawse Road, Opp Saibaba Nagar, Katemanevali, Kalyan (E), Thane – 421306, Email ID: kushlarawat@gmail.com/kushlarawatcs@gmail.com, Mob No: 8097314379

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- 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;

And based on the above examination we hereby report that, during the Review Period;

- a. ANUPAM FINSERV LIMITED, the listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, 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 47(1) - The listed entity shall publish the following information in the newspaper:  (a) - Notice of meeting of the board of directors where financial results shall be discussed.	<i>Company is in the default of publication of Notice of meeting of the board of directors where financial results shall be discussed during the period under review.</i>	Company has published the notices of the meeting on its official website ( <a href="http://www.anupamfinserv.com/">http://www.anupamfinserv.com/</a> ) and the BSE website ( <a href="http://www.bseindia.com/">www.bseindia.com</a> ).

- b. ANUPAM FINSERV LIMITED, 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/our examination of those records.
- c. The following are the details of actions taken against ANUPAM FINSERV LIMITED, 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 violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations / Remarks of the Practicing Company Secretary, if any.
01	Securities and Exchange Board of India (SEBI)	In respect of show cause notice dated June 30 <sup>th</sup> , 2016 in the matter of Inventure Growth and Securities Limited against Mr. Pravin Gala – Promoter Director of Anupam Finserv Ltd	<i>As per SEBI order dated August, 06<sup>th</sup> 2018 in reference to Show Cause Notice dated June 30<sup>th</sup>, 2016 in the matter of Inventure Growth and Securities Limited - Mr. Pravin Gala shall not associate himself with any listed company or company proposing to list, or any registered</i>	It is observed that Mr. Pravin Gala has preferred an appeal (Appeal No.361 of 2018) before the Securities Appellate Tribunal Mumbai dated 14 <sup>th</sup> December 2018 against the SEBI Order dated August, 06 <sup>th</sup> , 2018.  SAT has given an Interim

			<p><i>intermediary, in the capacity of a director, key management personnel or partner (in the case of a partnership firm), for a Period of 4 years, with effect from 01<sup>st</sup> January, 2019.</i></p>	<p>order that the above-mentioned resignation will not be operationalized from 01<sup>st</sup> January, 2019 until SAT order in the next hearing.</p> <p>Company has submitted disclosure under regulation 30 of SEBI (LODR), Regulation 2015 with BSE Limited.</p> <p><i>In this regard this is to further inform you that in the latest hearing dated 10/10/2019 SAT has allowed the appeal and set aside the aforementioned impugned order issued by SEBI against Mr. Pravin Gala, Whole Time Director and CFO of the Company Anupam Finserv Limited and in this regard Company has submitted disclosure under regulation 30 of SEBI (LODR), Regulation 2015 with BSE Limited.</i></p>
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***This is to inform further that during the period under review company has received email from BSE Limited for Price Movement and in this regard, company filed clarification on price moment with BSE Limited within the time limit. No further communication in this regard received from BSE Limited.***

- 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 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	<i>As per SEBI order dated August, 06<sup>th</sup> 2018 in reference to Show Cause Notice dated June 30<sup>th</sup>, 2016 in the matter of Inventure Growth and Securities Limited - Mr. Pravin Gala shall not associate</i>	31/03/2019	Mr. Pravin Gala has preferred an appeal (Appeal No.361 of 2018) before the Securities Appellate Tribunal, Mumbai dated 14 <sup>th</sup> December 2018 against the SEBI Order dated August, 06 <sup>th</sup> , 2018.	Mr. Pravin Gala has preferred an appeal (Appeal No.361 of 2018) before the Securities Appellate Tribunal Mumbai dated 14 <sup>th</sup> December 2018 against the SEBI Order dated August, 06 <sup>th</sup> , 2018.

**KUSHLA RAWAT AND ASSOCIATES**  
**Company Secretaries**

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Thane – 421306, Email ID: kushlarawat@gmail.com/kushlarawatcs@gmail.com, Mob No: 8097314379

<i>himself with any listed company or company proposing to list, or any registered intermediary, in the capacity of a director, key management personnel or partner (in the case of a partnership firm), for a Period of 4 years, with effect from 01<sup>st</sup> January, 2019.</i>		SAT has given an Interim order that the above-mentioned resignation will not be operationalized from 01 <sup>st</sup> January, 2019 until SAT order in the next hearing. Company has submitted disclosure under regulation 30 of SEBI (LODR), Regulation 2015 with BSE Limited.	
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**For Kushla Rawat & Associates**  
**Company Secretaries**  
**Firm Registration No: I2013MH1092100**

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KUSHLA RAWAT  
RAWAT Date: 2020.07.13  
16:09:39 +05'30'

**(Kushla Rawat)**  
**ACS No: 33413, COP No: 12566**

**Place: Mumbai**  
**Date: 13/07/2020**  
**UDIN: A033413B000445211**