

KUSHLA RAWAT & ASSOCIATES
Company Secretaries

Add: C/201 Shubham Paradise, S. P. Road, Kalyan-Dombivali (M. Corp), Kalyan (E), Thane – 421306

Contact Details: kushlarawatcs@gmail.com/cscaoffice2017@gmail.com, Mob No: 7039871321

Secretarial Compliance Report of ANUPAM FINSERV LIMITED
For the Year Ended 31st March 2021

To,
The Members,
ANUPAM FINSERV LIMITED
(Formerly Known as Vantage Corporate Services Limited)

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 **31st March 2021** 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, 2008 **(Not applicable to the company during the review period)**;

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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.
- 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.
1	SEBI	<i>Administrative warning letter SEBI/HO/CFD/DCR2/OW/P/2021/08066/1 from SEBI for violation of Regulation 8(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 for – No disclosure in 1 Occasion and delayed disclosure on 12 occasions from 30/04/1998 to 30/04/2011</i>	<i>Warning Letter</i>	<i>SEBI warned to the company for the aforesaid violations and advised to exercise due caution in future with respect to disclosures under SEBI (SAST) Regulations, 2011.</i>

- 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	-	-	-

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- e. The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on “Resignation of statutory auditors from listed entities and their material subsidiaries” is not applicable during the Review Period.

For Kushla Rawat & Associates
Company Secretaries
Firm Registration No: I2013MH1092100

KUSHLA Digitally signed by
KUSHLA RAWAT
RAWAT Date: 2021.06.23
14:25:50 +05'30'

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

Place: Mumbai
Date: 23/06/2021
UDIN: A033413C000501793