



May 22, 2025

To,
BSE Limited,
Listing Department
25th Floor, P J Towers,
Dalal Street, Fort
Mumbai-400 001

Scrip Code: 532007

Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended March 31, 2025

Dear Sir/Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, Please find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2025.

You are requested to take the same on your records.

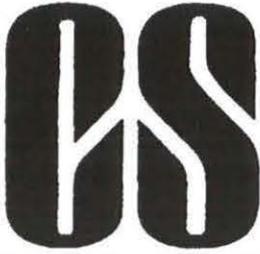
Please disseminate this information on your official website and oblige.

Thanking You,
Yours faithfully,

For **SHREEVATSAA FINANCE AND LEASING LIMITED**

Ashish Thakur
(Company Secretary & Compliance Officer)

Encl: as above



RABI SATAPATHY & ASSOCIATES

COMPANY SECRETARIES

B1/1781, 2nd Floor, Vasant Kunj, New Delhi-110070

Mob. No: 9811027139, 8700870181, Off.: 011-41811780

E-mail: rsacacs@gmail.com, rsaroc1@gmail.com

SECRETARIAL COMPLIANCE REPORT OF SHREEVATSAA FINANCE AND LEASING LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2025

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To

The Board of Directors

SHREEVATSAA FINANCE AND LEASING LIMITED

Registered office: Room No. 559, Third Floor, 'Padam Towers-I',
14/113, Civil Lines, Kanpur,
Uttar Pradesh-208001

Dear Sirs,

We, Rabi Satapathy & Associates, Practicing Companies Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Shreevatsaa Finance and Leasing 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 certification,

for the financial year ending on 31st March, 2025 (**"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) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; (**"SEBI LODR Regulations 2015"**)



- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable during the period under review**
- (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 during the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable during the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable during the period under review**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable to the Company;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not applicable during the period under review**
- (k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;

and based on the above examination, we hereby report that, during the review period:

- I. The listed entity has complied with the provisions of the above Regulations and Circulars/guidelines issued thereunder, except in respect of matters specified below:

| S. No | Compliance Requirement (Regulations /Circulars /Guidelines including specific clause) | Regulation/ Circular No. | Deviations | Action taken by | Type of Action | Details of Violation | Fine Amount | Observations / Remarks of the Practicing Company Secretary) | Management Response | Remarks |
|-------|---|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|
| | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL | NIL |



II. The listed entity has taken the following actions to comply with the observations made in previous reports:

| S. No | Observations/ Remarks of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended March 31, 2025 | Compliance Requirement (Regulations/circulars/ guidelines including specific clause) | Details of Violation/ deviations and action taken /penalty imposed, if any, on the listed entity | Remedial actions, if any, taken by the listed entity | Comments of the PCS on the action taken by the listed entity |
|-------|---|--|--|--|--|--|
| | NIL | NIL | NIL | NIL | NIL | NIL |

III. We hereby further report that, during the period under review the compliance status of the listed entity is appended as below –

| Sr. No. | Particulars | Compliance Status (Yes/No/NA) | Observations/ Remarks by PCS* |
|---------|---|-------------------------------|---|
| 1. | <u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) | Yes | |
| 2. | <u>Adoption and timely updation of the Policies:</u> <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 Yes | |
| 3. | <u>Maintenance and disclosures on Website:</u> <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 | Yes Yes Yes |  |

| | | | |
|-----|---|-------------------------|---|
| | the relevant document(s)/section of the website. | | |
| 4. | <u>Disqualification of Director</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | |
| 5. | <u>Details related to Subsidiaries of listed entities:</u> a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries | NA | The listed entity has no material subsidiary company. |
| 6. | <u>Preservation of Documents:</u> 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. | Yes | |
| 7. | <u>Performance Evaluation:</u> 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 | Yes | |
| 8. | <u>Related Party Transactions:</u> a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or 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. | Yes No such Case | |
| 9. | <u>Disclosure of events or information:</u> 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. | Yes | |
| 10. | <u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 | Yes | |
| 11. | <u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including | Yes | No actions were taken by SEBI or Stock Exchange during the review period. |



| | | | |
|-----|--|-----|---|
| | under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder. | | |
| 12. | <p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p> | Yes | <p>The auditor resigned on May 14, 2024 and also given the Result and Auditor Report for the period 31st March, 2024</p> <p>No concern has been raised in writing by the statutory auditor with respect to the listed entity</p> |
| 13. | <p><u>Additional non-compliances, if any:</u></p> <p>No additional non-compliance observed for any SEBI regulation/circular/ guidance note etc.</p> | NA | During the period under review, no action is taken by SEBI or Stock Exchange. |

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 certify 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

For **RABI SATAPATHY & ASSOCIATES**

Company Secretaries



22/05/2025

(Rabindra Kumar Satapathy)

Practicing Company Secretary

Membership No.: FCS-8282

COP No.: 4270

PR No.: 2415/2022

UDIN: F008282G000405778

Place: New Delhi

Date: 22.05.2025