

**APOORVA LEASING FINANCE AND INVESTMENT COMPANY LIMITED**

Corporate Office: C-1/9 First Floor, Sector - 31, Gautam Budh Nagar, Noida, 201301

CIN No. L74899DL1983PLC016713 Email : [apoorvaleasing@gmail.com](mailto:apoorvaleasing@gmail.com)

PH # 0120 - 4372849

29<sup>th</sup> June, 2021

To

**The Department of Corporate Services,**

BSE Limited

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai- 400001

**Scrip Code- 539545**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015**

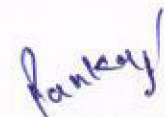
Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Please find enclosed the Secretarial Compliance Report for the year ended on 31<sup>st</sup> March, 2021 issued by M/s SPR & CO., practicing Company Secretaries

Kindly take the same on your records.

Thanking You,

Yours Faithfully,

For **Apoorva Leasing Finance & Investment Company Limited**



**Pankaj Mishra**  
Company Secretary



Encl: as above

**SECRETARIAL COMPLIANCE REPORT**

**of**  
**M/S Apoorva Leasing Finance and Investment Company Limited**  
**For The Financial Year Ended 31st March, 2021**

We, **M/s SPR & Co.** have examined:

- a) All the documents and records made available to us and explanation provided by Apoorva Leasing Finance and Investment Company 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 year ended 31<sup>st</sup> March 2021 ("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;
- (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;
- (e) \*Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) \*Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) \*Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- (j) \*The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999;
- (k) \*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;
- (l) \*The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

\* No event took place under these regulations during the period under Report.



And based on the above examination, I/We 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, as per management Representation: - *No Observations*
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far as it appears from 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 taken e.g fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any
1.	BSE	<b>Regulation 17(1)</b> Non-compliance with the requirements pertaining to the composition of the Board.	BSE levied fine of RS Rs. 5,000 per day (computed till quarter ended June and September, 2020) i.e. Rs. 8,79,100	Company applied to BSE for waiver of penalty levied under regulations 17(1) of SEBI LODR Regulation and waived by BSE.
2.	BSE	<b>Regulation 33</b> Non-submission of the financial results within the period prescribed under this regulation	BSE levied fine of RS 41,300 for Late submission of Standalone financial results (quarter December 2020)	Company applied to BSE for waiver of penalty levied under regulations 33 of SEBI LODR Regulation and still pending with BSE.

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: *Not Applicable*

Sr. No	Observation 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)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity

Note:- Company trading is restricted by BSE on account of GSM (Graded Surveillance Measures) and during the F/Y 2019-2020, Promoters shareholding was 1,01,19,780 however said shareholding of promoters has been increased to 1,05,18,780 in F/Y 2020-2021.



# SPR & CO.

COMPANY SECRETARIES

303, Gupta Plaza, LSC Bhera Enclave,  
Paschim Vihar, New Delhi -110087  
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E-mail: officespranjan@gmail.com

I, further, report that there was no event of appointment/re-appointment/resignation of Statutory Auditors of the Company during the year under review and the Company has modified the terms of appointment of its existing Statutory Auditor. In this regard, I report that Company has complied with Para 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: New Delhi  
Date: 21-06-2021

For M/s SPR & Co.



**S.P. RANJAN**  
Practicing Company Secretaries  
ACS No: 44711, C P No: 18319  
UDIN- A044711C000493302