

APOORVA LEASING FINANCE & INVESTMENT CO. LTD.

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

CIN No. L74899DL1983PLC016713 Email : apoorvaleasing@gmail.com

PH # 0120 - 4372849

28th May, 2019

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 31st March, 2019 issued by M/s Dharamveer Dabodia & Associates, practicing Company Secretaries

Kindly take the same on your records.

Thanking You,

Yours Faithfully,

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

Pankaj

Pankaj Mishra

Company Secretary & Compliance Officer



Encl: as above



SECRETARIAL COMPLIANCE REPORT

of
Apoorva Leasing Finance and Investment Company Limited,
for the year ended 31st March 2019.

We, Dharamveer Dabodia & Associates 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 31st March 2019 ("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 thereunder;
- (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.

DHARAM VEER Digitally signed by
DHARAM VEER DABODIA
DABODIA Date: 2019.03.27
18:28:04 +05'30'

Regd. Off.: 517, GF, Samalka, New Delhi- 110037 Ph.: # +91 9811219161
Email: dharamveerdabodia@gmail.com

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 thereunder, except in respect of matters specified below:- *No Observations*

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary

- (b) 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 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 thereunder: *No such action has been taken as per the management Representation dated 27.05.2019.*

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

- (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

Place: New Delhi
Date: 27.05.2019

For Dharamveer Dabodia and Associates
Company Secretaries

DHARAM VEER Digitally signed by
DABODIA DHARAM VEER DABODIA
Date: 2019.05.27 18:26:41 +05'30'

CS Dharamveer Dabodia

ACS No. 29365
CP No.: 14305