

Date: 01st June, 2021

To,
The Manager (CRD),
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

Scrip Code: 508954

Sub: Annual Secretarial Compliance Report under Reg. 24A of SEBI (LODR) Regulations, 2015.


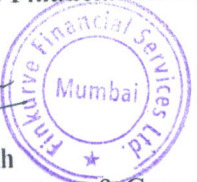
Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated 8 February 2019, we hereby submit the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021 issued by M/s. Mayank Arora & Co., Company Secretaries.

You are requested to kindly take the same on record.

Thanking you.

For Finkurve Financial Services Limited



Sunny Parekh
Company Secretary & Compliance Officer
Membership No.: ACS: 32611

Arvog
FINANCE

Finkurve Financial Services Limited
CIN: L65990MH1984PLC032403

Registered office: 202/A, 02nd Floor, Trade World, D-Wing, Kamala Mills,
Compound, S.B. Marg, Lower Parel West, Mumbai - 400013
Tel: +91 22 42441200 | Email: mail@arvog.com | Web: www.arvog.com

Secretarial Compliance Report of Finkurve Financial Services Limited for the Financial Year ended March 31, 2021

I, Mayank Arora, Practicing Company Secretary, proprietor of M/s. Mayank Arora & Co., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Finkurve Financial Services 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 March 31, 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 -**not applicable to the Company during the period under review**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- **not applicable to the Company during the period under review**;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- **not applicable to the Company during the period under review**;
- (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 period under review**;

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- And circulars/ guidelines issued thereunder;

and based on the above examination, I/We hereby report that, during the Review Period:

- (a) The listed entity has generally 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.	Regulation 47 - Advertisement in Newspaper	The Statements of deviation(s) or variation(s) as specified in sub-regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report; shall be published in at least one English language national daily newspaper circulating in the whole or substantially the whole of India and in one daily newspaper published in the language of the region, where the registered office of the listed entity is situated and shall also be submitted simultaneously to the stock Exchange.	The Company has submitted the Statements of deviation(s) or variation(s) to BSE Ltd. and also published the same in the newspaper as specified in sub-regulation (1) (c) of regulation 47 for the quarter ended 31 st March, 2020. However, the copy of such newspaper publication was not submitted to the Stock Exchange

Note: The Consolidated Cash flow Statement for the financial year ended 31st March, 2020 was not visible in the scanned copy of the Consolidated Financial Statements submitted by the Company to the Stock Exchange due to some technical error and the Stock Exchange had raised a query regarding the same. The Company, in response to query, had promptly submitted the revised financial statements on 11th August, 2020.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) Action 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 : NIL

(d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period,

Sr. No .	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<p>The Company has not made Disclosure to the Stock Exchange as per Regulation 32 of SEBI (Listing Obligations and Disclosure Requirements) Regulations. Pursuant to Regulations 32(1), 32(2) and 32(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI LODR Regulations') and Circular no. CIR/CFD/CMD1/162/2019 dated December 24, 2019 by SEBI, a listed entity is, inter alia, required to submit to the stock exchange, a statement of deviation or variation, pursuant to review by the audit committee, on a quarterly basis for public issue, rights issue, preferential issue etc. indicating,</p> <ul style="list-style-type: none"> ➤ deviations, if any, in the use of proceeds of public issue, rights issue, preferential issue etc. and ➤ the category wise variation between projected utilization of funds and the actual utilization of funds. 	<p>The Company in its Board Meeting held on 12th April, 2019 inter alia, considered and approved the Issue and Allotment of Equity Shares. However, the said disclosure was not given to the Stock Exchange as the Company is of the view that the said disclosure is required to be given only if there is any deviation in the use of proceeds of issue and that as the funds raised by the Company were fully utilized till the end of 1st Quarter, the Company had not made the said disclosure.</p>	<p>The Company has not given the said Disclosure to the Stock Exchange.</p>	<p>The Company has complied with the said Compliance in the reporting Financial year.</p>
2.	<p>As per Regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed Entity are required to</p>	<p>The Company has not published Statements of deviation(s) or variation(s) as specified in sub-regulation (1) of</p>	<p>The Company has not publish the Statement of Deviation or</p>	<p>The Company has complied with the said Compliance in the reporting</p>

	<p>publish statement of Deviation or variation(s) as specified in sub-regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report; shall be published in at least one English language national daily newspaper circulating in the whole or substantially the whole of India and in one daily newspaper published in the language of the region, where the registered office of the listed entity is situated.</p>	<p>regulation 32, which is specified as per clause (c) of sub regulation (1) of regulation 47 due to the above mentioned reason</p>	<p>Variation as per regulation 47 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015</p>	<p>Financial year. Further, The Company has published Statements of deviation(s) or variation(s) in the newspaper as specified in sub-regulation (1) (c) of regulation 47 for the quarter ended 31stMarch, 2020. However, the copy of such newspaper publication was not submitted to the Stock Exchange</p>
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(e) Further I report that BSE Ltd. has sought clarification from the Company on 14th January, 2021 with reference to the significant movement in price in order to ensure that investors have latest relevant information about the Company and to inform the market so that interest of the Inventors is safeguard. In this regard, the Company has given a justified explanation vide its letter dated 14th January, 2021.

Date: 31/05/2021

Place: Mumbai

UDIN: F010378C000400878

**For Mayank Arora & Co.
Company Secretaries**

**MAYANK
ARORA**
Digitally signed by MAYANK ARORA
 DN: cn=IN, o=Personal,
 postalCode=400002,
 st=MAHARASHTRA,
 serialNumber=445c176aba6339ef3
 3cb38ba6ce393270b2863cc777a87
 2714b386d4849c4c; c=INMAYANK
 ARORA
 Date: 2021.05.31 17:53:03 +05'30'

**Mayank Arora
Proprietor
C.P. No. 13609**

***Note:** The COVID-19 outbreak was declared as a global pandemic by the World Health Organization. The State Government and Central Government announced a strict lockdown which was further extended due to the spread of the virus. Hence, due to COVID19 pandemic impact, the compliance documents for the review period were obtained through electronic mode and verified with requirements.*