

Dated: 30th May, 2026

To
The Secretary,
Corporate Relationship Department,
The BSE Limited,
Phiroze Jeejeebhoy Towers, 'A' wing
Dalal Street, Fort Mumbai - 400001

Subject: Submission of Annual Secretarial Compliance Report for the Financial Year 2025-26 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2025.

Reference: Swastika Investmart Limited (BSE Scrip Code 530585; ISIN INE691C01022)

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year 2025-26 issued by L.N. Joshi & Co., Practicing Company Secretaries.

You are requested to take the same on record.

Thanking you,

FOR SWASTIKA INVESTMART LIMITED

Shikha Agrawal
Company Secretary & Compliance Officer
M. No. A36520

Encl.: as above

Swastika Investmart Limited

Corp. Off. : 48 Jaora Compound, M.Y.H. Road, Indore-452001 ☎ 0731 66 44 000

Regd. Off. : Office No. 104, 1st Floor, Keshava Commercial Building, Plot No. C-5, "E" Block, Bandra Kurla Complex,
Opp GST Bhavan, Bandra (East), Mumbai - 400051 ☎ 022 690 11544

✉ hello@swastika.co.in 🌐 www.swastika.co.in CIN : L 65910 MH 1992 PLC 067052



**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF**

SWASTIKA INVESTMART LIMITED

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, L.N. Joshi, proprietor of L N Joshi and Co., Company Secretaries have examined:

- a) all the relevant documents and records to the extent made available to me and explanations provided by **SWASTIKA INVESTMART LIMITED (“the listed entity”)**,
- b) the filings/ submissions made by the listed entity to BSE Limited,
- c) Website of the listed entity, i.e. www.swastika.co.in
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the financial year ended 31st March, 2026 (“**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 there under; and
- b) the Securities Contracts (Regulation) Act, 1956 (“**SCRA**”), rules made there under and the Regulations, circulars, guidelines issued there under 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 (Buy-back of Securities) Regulations, 2018;
[Not Applicable as there was no reportable event during the financial year under review];
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **[Not Applicable as there was no reportable event during the financial year 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;
- i) Securities and Exchange Board of India (Intermediaries) Regulations, 2008;
- j) Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026;
- k) Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992;
- l) Securities and Exchange Board of India (Investment Advisers) Regulations, 2013;
- m) Securities and Exchange Board of India (Research Analysts) Regulations, 2014;
- n) Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020;
- o) Securities and Exchange Board of India {KYC (Know Your Client) Registration Agency} Regulations, 2011;
- p) Securities and Exchange Board of India (Certification of Associated persons in the Securities Markets), Regulation 2007;

and the circulars/ guidelines issued there under; and based on the above examination, I 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, **except in respect of matters specified in attached Annexure 1.**
- b) The listed entity has taken the following actions to comply with the observations made in previous report:*

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

*Note: No action was required to be taken by the Company during the current year on the observations made in the previous reports, since such observations pertained to certain technical and operational discrepancies under the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956 (SCRA), and other applicable circulars and regulations in the capacity of stock/commodity broker and Merchant Banker.

The concerned authorities had initiated actions in the normal course, and the applicable penalties/fees, wherever levied, were duly paid by the Company within the prescribed due dates.

C. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS
01	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	
02	<p>Adoption and timely up-dation of the Policies:</p> <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 & timely updated, as per the regulations/ circulars/ guidelines issued by SEBI 	Yes Yes	
03	<p>Maintenance and disclosures on Website:</p> <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 redirects to the relevant document(s)/ section of the website. 	Yes Yes Yes	
04	<p>Disqualification of Director(s):</p> <p>None of the Director(s) of the listed entity are disqualified under Section 164 of</p>	Yes	

	Companies Act, 2013 as confirmed by listed entity.		
05	<p>Details related to Subsidiaries of listed entity have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirement with respect to disclosure of material as well as other subsidiaries</p>	<p>No</p> <p>Yes</p>	During the year under review, the Company did not have any material subsidiary Company, however company having subsidiaries Companies.
06	<p>Preservation of Documents:</p> <p>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.</p>	Yes	
07	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	
08	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions;</p> <p>(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.</p>	<p>Yes</p> <p>NA</p>	Please refer point no. 8(a)
09	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation</p>	Yes	Imposition of fine or penalty by the stock exchange, Depositories or other

	30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		regulatory authorities which are lower than the monetary thresholds specified under Para A(20) of Part A of Schedule III of SEBI LODR Regulations, 2015 were reported in Integrated Filing (Governance) XBRL on a quarterly basis.
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	Actions taken by SEBI or Stock Exchange, if any: No Actions has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under.	No	Details of action taken by SEBI/Stock Exchanges/depositories have been specified in Annexure 1
12	Resignation of Statutory auditors from the listed entity or its material subsidiaries: 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 subsidiaries 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	NA	There was no Resignation of the Statutory Auditor of the Company or its material subsidiary during the review period.
13	Additional Non-compliances, if any:	Yes	

	No additional non-compliance observed for all SEBI regulation / circular / guidance note etc.		
14	<p>The listed entity to comply with the following requirements for disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the SEBI LODR Regulations, 2015:</p> <p>a) The scheme document shall be uploaded on the website of the listed entity after obtaining shareholder approval as required under SEBI (SBEB) Regulations, 2021.</p> <p>b) The documents uploaded on the website shall mandatorily have minimum information to be disclosed to shareholders as per SEBI (SBEB) Regulations, 2021.</p> <p>c) The rationale for redacting information from the documents and the justification as to how such redacted information would affect competitive position or reveal commercial secrets of the listed entity shall be placed before the board of directors for consideration and approval.</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Members of the Company at their 33rd AGM held on 27th June, 2025 approved the introduction and implementation of Swastika Investmart Limited-Employee Stock Option Scheme 2025 ('Swastika ESOS-2025') and the approved scheme document has been hosted on the website of the Company in compliance with Regulation 46(2)(za) of SEBI LODR Regulations, 2015 read with SEBI (SBEB) Regulations, 2021.</p>

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

Assumptions and 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. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

5. It is the responsibility of the Company's management to maintain records and establish appropriate systems for ensuring compliance with applicable SEBI Regulations, circulars, and guidelines issued from time to time and to ensure the adequacy and operational effectiveness of such systems.
6. The audit was conducted in accordance with the **Guidance Note on Annual Secretarial Compliance Report** issued by the **Institute of Company Secretaries of India (ICSI)**, involving such examinations and verifications as deemed necessary and adequate for the purpose.

Date: 29th May, 2026
Place: Indore
UDIN: F005201H000533575

For L.N. Joshi & Company
Company Secretaries

Laxmi
Narayan Joshi

Digitally signed by
Laxmi Narayan Joshi
Date: 2026.05.29
19:24:41 +05'30'

L.N. Joshi
Proprietor
FCS: 5201, C P No: 4216
PR Certificate No. 1722/2022
Unique Code Number: S2002MP836100

ANNEXURE-1

Sr No	Compliance requirement (regulations/circulars/guidelines including specific clauses)	Regulation Name/ Circular number	SEBI Regulation Number/ circular dated	Deviations	Action taken by	Name of Other Regulatory Body	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of other action taken	Details of violation	Fine Amount	Observations/remarks of the practising Company Secretary, if any	Management Response	Remarks
1	Reporting of CTCL terminals details	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NSE Circular No. NSE/MSD/34638 dated April 13, 2017 and BSE Notice No. 20180214-31 dated 14th Feb, 2018	Penalty levied for Mismatch of CTCL details in NSE & BSE	Stock Exchange		Fine	-	Penalty levied for Mismatch of CTCL details in NSE & BSE	9100.00	penalty paid	Necessary action have been taken and the observation stands closed. Maker-checker controls have been strengthened to avoid recurrence of such discrepancies.	-
2	Non Compliance reported in Internal Audit Report for the half year ended on 31st March, 2024 and 30th September 2024 submitted to MCX	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	MCX circular nos. MCX/INSP/325/2016 dated September 29, 2016, MCX/INSP/602/2019 dated October 23, 2019 and MCX/INSP/686/2024 dated October 10, 2024.	For half year ended on 31st March, 2024, penalty levied for delay reporting of a Demat account details and for half year ended on 30th Sep., 2024, penalty levied with respect to not following the upstream and downstream norms for rotation of client's fund and delay reporting of Bank account detail.	Stock Exchange		Fine	-	For half year ended on 31st March, 2024, penalty levied of Rs. 5,000/- for delay reporting of a Demat account details and for half year ended on 30th Sep., 2024, penalty levied of Rs. 30,000/-with respect to not following the upstream and downstream norms for rotation of client's fund and delay reporting of Bank account detail.	35000	penalty paid	Necessary corrective actions have been taken and the observation stands closed. The deviations relating to usage of clients fund was procedural in nature and pertained only to the upstreaming and downstreaming process of clients funds. At no point client funds were misused, which has also been acknowledged by the auditor. Further necessary instruction given to strictly adhere to the prescribed process.	-
3	Entry of incorrect PAN details in CDAS CDSL System and Uploading of Delivery Instruction Slips (DIS) in CDSL	Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	SEBI Circular No. CIR/MRD/DP/01/2014 dated January 7, 2014, and CDSL Communique No. CDSL/OPS/DP/1454 dated 05-Feb-2009, CDSL/OPS/DP/2221 dated 28-Dec-2010, CDSL/AJ&C/DP/POLCY/2024/428 dated August 1, 2024 and no. CDSL/OPS/DP/ACCTS/6040 dated 26th July 2016	Incorrect entry of PAN details in CDAS during the month of April-2025 and September-2025 (2 case) and, Delivery Instruction Slips (DIS) were not uploaded within the stipulated timeframe (14 cases)	Other Regulatory Body	CDSL	Fine	-	Incorrect entry of PAN details in CDAS during the month of April-2025 and September-2025 (2 case) and, 14 Delivery Instruction Slips (DIS) were not uploaded within the stipulated timeframe	3800.00	penalty paid	Necessary corrective actions have been taken and the observation stands closed and precautions have also been communicated to avoid recurrence of such errors in future.	-
4	Non Compliance reported in the Internal Audit Report for the half year ended on 31st March, 2025 submitted to MCX	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	MCX circular nos. MCX/INSP/325/2016 dated September 29, 2016, MCX/INSP/602/2019 dated October 23, 2019, SEBI/HO/MRD/MRD-PoD-3/2024/088 dated June 25, 2024 and MCX/INSP/187/2025 dated April 15, 2025	Observation raised for not providing evidences for sending of weekly Statements of Accounts of funds & securities to clients and, incorrect reporting of Segregation and Monitoring of Collateral at Client Level.	Stock Exchange		Fine	-	Observation raised for not providing evidences for sending of weekly Statements of Accounts of funds & securities to clients and, incorrect reporting of Segregation and Monitoring of Collateral at Client Level.	20000	penalty paid	The statements were shared within the prescribed timeline; however, due to technical issues, supporting logs could not be retrieved. The segregation reporting issue occurred due to a back-office system issue, which has been resolved. Necessary measures have been taken to avoid recurrence and the observation stands closed.	-
5	Segregation and Monitoring of Collateral at Client Level	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	SEBI Circular No. SEBI/HO/MRD2_DCAP/CIR/2021/0598 dated 20th July, 2021; NCL: NCL/CMPT/51657 dated March 17, 2022; NCL: NCL/CMPT/55687 dated February 20, 2023; MCXCL: MCXCL/C&S/102/2022 dated April 27, 2022 and NCCL/CLEARING-013/2022 dated April 12, 2022	During the FY 25-26, Clearing Corporation namely NCL/MCXCL/NCCL have observed certain discrepancies in reporting of Segregation and Monitoring of Collateral at Client Level.	Other Regulatory Body	Clearing Corporation s- NCL/MCXCL/NCCL	Fine	-	Penalty levied by NCL/MCXCL/NCCL for short allocation of client's collateral against its Margin requirement during the FY 25-26	617830.71	penalty paid	Due to certain back-office technical issues, shortfalls occurred while allocating client collateral despite sufficient collateral being available in the clients' accounts against their margin requirements. Necessary corrective measures have been implemented to avoid recurrence of such instances in future.	-
6	Incorrect reporting of margin collection from clients	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NSE Circular No. NSE/INSP/45534 dated August 31, 2020 (CM), NSE/INSP/45191 dated July 31, 2020	During the offsite inspection conducted in the month of Jan. 2025 and Sep. 2025, observation raised for incorrect reporting of margin collection from clients (02 instance).	Stock Exchange		Fine	-	During the offsite inspection conducted in the month of Jan. 2025 and Sep. 2025, observation raised for incorrect reporting of margin collection from clients (02 instance).	6500	penalty paid	Necessary corrective actions have been taken and the observation stands closed. In one case, the discrepancy arose due to a technical issue in the back-office system following an ISIN change pursuant to a corporate action and in another case, a technical issue arose in the pledge process, though reflected as successful in the internal system, could not be completed at the depository level.	-
7	Inspection of TM's Branch Office	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	MCX circular no. MCX/INSP/572/2024 dated August 29, 2024	MCX levied a penalty for non-conduct of branch inspections as prescribed and for deviations in the format of the Branch Inspection Report submitted to MCX. Further, a penalty along with an advisory was levied in respect of another branch for non-maintenance of the Complaint Register and Visitor Register, and for operation of a terminal by an unapproved user at the branch office.	Stock Exchange		Fine	-	MCX levied a penalty for non-conduct of branch inspections as prescribed and for deviations in the format of the Branch Inspection Report submitted to MCX. Further, a penalty along with an advisory was levied in respect of another branch for non-maintenance of the Complaint Register and Visitor Register, and for operation of a terminal by an unapproved user at the branch office.	46500	penalty paid	Necessary corrective actions have been taken and the observation stands closed and precautions have also been communicated to avoid recurrence of such errors in future.	-

8	Submission of opening of new bank account details	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NSE Circular No. NSE/INSP/2016/33276 dated September 27, 2016 read with SEBI Circular No. SEBI/HO/MIRSD/MIRSD2/CIR/P/2016/95 dated September 26, 2016	Penalty levied for delay submission of new bank account details to NSE	Stock Exchange		Fine	-	Company reported opening of a new demat account details with 1 day delay.	5000	penalty paid	Necessary corrective actions have been taken and the observation stands closed. The Company has implemented maker checker system to ensure timely reporting in future.	-
9	Non Compliance reported in Internal Audit Report for the half year ended on 31st March, 2025 submitted to NCDEX	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NCDEX circular no. NCDEX/COMPLIANCE-016/2025 dated April 21, 2025	Penalty levied for non compliance observed for incorrect segregation reporting of clients' funds	Stock Exchange		Fine	-	Penalty levied for non compliance reported for incorrect segregation reporting of clients funds	7500	penalty paid	This discrepancy occurred due to a back-office system issue, which have been resolved later and Necessary corrective measures have taken to ensure accurate reporting.	-
10	Non-Compliance reported in Internal Audit Report for the half year ended on 31st March 2025 submitted to NSE	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NSE Circular Nos. NSE/INSP/51110 dated January 24, 2022, and NSE/INSP/53530 dated September 2, 2022	Penalty levied for execution of client's trades without keeping evidence placing such order, non sending of weekly Statement of Accounts for funds & securities in prescribed time frame and for trading in minor client account (5 cases).	Stock Exchange		Fine	-	Penalty levied for execution of client's trades without keeping evidence placing such order, non sending of weekly Statement of Accounts for funds & securities in prescribed time frame and for trading in minor client account (5 cases).	150000	penalty paid	The discrepancy occurred due to a technical system issue, due to which evidences for placement of trades and dispatch of weekly statements of funds to clients within the prescribed time frame could not be retrieved. To avoid recurrence, a dual backup system has been implemented. Further, due to an unforeseen system lapse, trading was allowed in 5 minor client codes. The issue was immediately rectified and additional manual verification controls have been introduced to prevent recurrence.	-
11	Regular inspection conducted by NSDL from July 21, 2025 - July 25, 2025	Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 read with NSDL By-laws and relevant circulars	NSDL has observed certain minor operational discrepancies in their Regular Inspection conducted from July 21, 2025 to July 25, 2025	Other Regulatory Body	NSDL	Fine	-	NSDL has observed and levy penalty for certain minor operational discrepancies observed during Regular Inspection conducted from July 21, 2025 to July 25, 2025	9200	penalty paid	Necessary corrective actions have been taken and the observation stands closed and precautions have also been communicated to avoid recurrence of such errors in future.	-
12	Allocation of Excess Collateral	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	SEBI Circular No. SEBI/HO/MRD2_DCAP/CIR/2021/0598 dated 20th July, 2021; NCCL circular no. NCCL/CLEARING-035/2022 dated August 05, 2022; NCCL/COMPLIANCE015/2019 dated December 20, 2019	NCCL have observed certain discrepancies in reporting of Allocation of Client Collateral for Period Aug 23 - Mar 24	Other Regulatory Body	Clearing Corporation s-NCCL	Fine	-	NCCL have observed certain discrepancies in reporting of Allocation of Client Collateral for Period Aug 23 - Mar 24	5840	penalty paid	Necessary action have been taken and the observation stands closed. Due to a technical issue in the back-office system, the shortfall was reported despite adequate availability of collateral against the required margin. Considering the availability, only 1% penalty was levied by NCCL.	-
13	Non Submission of Client Collateral Segregation data	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	NCL circular NCL/CMPL/56655 dated May 09, 2023	Penalty levied for delay submission of Client Collateral Segregation data in the month of Feb 2025, March 2025 and April 2025	Other Regulatory Body	Clearing Corporation s-NCL	Fine	-	Penalty levied for delay submission of Client Collateral Segregation data in the month of Feb 2025, March 2025 and April 2025	2679.6	penalty paid	Necessary action have been taken and the observation stands closed. Maker-checker controls have been strengthened to avoid recurrence of such discrepancies.	-
14	Maintaining of continuous two-way market making quotes for the prescribed duration	Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992	SEBI Circular No. CIR/MRD/DP/14/2010 dated April 26, 2010, read with BSE Notice no. 20120309-32 dated 9th March 2012	Penalty levied by BSE for Non Maintaining continuous two-way market making quotes for the prescribed duration	Stock Exchange		Fine	-	Penalty levied by BSE for Non Maintaining continuous two-way market making quotes for the prescribed duration	10000	penalty paid	Necessary action have been taken and the observation stands closed. Maker-checker controls have been strengthened to avoid recurrence of such discrepancies.	-
15	Incorrect reporting of excess collateral availability with other CC	Securities and Exchange Board of India (Stock Brokers) Regulations, 1992/2026	SEBI circular no. SEBI/HO/MRD2_DCAP/CIR/2021/0598 dated July 20, 2021 read with NCCL Circular no. NCCL/CLEARING-035/2022 dated August 05, 2022	Penalty levied by NCCL for wrong reporting of excess collateral availability with other CCs for the period from August 2022 to July 2023	Other Regulatory Body	NCCL	Fine	-	Penalty levied by NCCL for wrong reporting of excess collateral availability with other CC for the period from August 2022 to July 2023	121871	penalty paid	Necessary corrective actions have been taken and the observation stands closed. The error was on account of technical issues in Back Office system, although sufficient collateral was available. Further necessary instruction given to strictly adhere to the prescribed process.	-

**For L.N. Joshi & Company
Company Secretaries**

Laxmi
Narayan Joshi

Digitally signed by Laxmi
Narayan Joshi
Date: 2026.09.29 19:25:08
+05'30'

L.N. Joshi
Proprietor
FCS: 5201, C P No: 4216
Unique Code Number: S2002MP836100
PR Certificate No. 1722/2022