

# CRESCENT FINSTOCK LIMITED

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Date: 30<sup>th</sup> June, 2021

To,  
Metropolitan Stock Exchange of India Limited,  
Vibgyor Towers, 4<sup>th</sup> Floor, Plot No. C 62,  
G-Block, Opp. Trident Hotel, Bandra Kurla Complex,  
Bandra (E), Mumbai – 400098

Sub.: Annual Secretarial Compliance Report for the Year Ended March 31, 2021 Ref: SEBI  
Circular No. CIR/CFD/CMD1/ 2712019 dated 8<sup>th</sup> February, 2019.

**Symbol: CRESCENT**

Dear Sir / Madam,

Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 8, 2019, we attach herewith Annual Secretarial Compliance Report issued by Practicing Company Secretary for the year ended March 31, 2021.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For Crescent Finstock Limited



Mehnuddin Khan  
Company Secretary & Compliance Officer  
Membership No. A40156

# Mayank Arora & Co.

Company Secretaries

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## Secretarial Compliance Report of Crescent Finstock 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 **Crescent Finstock 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.	Trading Window Closure - SEBI (Prohibition of Insider Trading Regulation ), 2015	Delay in intimation of Trading Window Closure For June, 2020 Quarter.	<p>There was a delay in intimation of Trading Window Closure for June, 2020 Quarter. For June, 2020 Quarter intimation of Trading Window Closure was required to be made before 1st July, 2020 but same has was done on 3rd August, 2020 to the Stock Exchange.</p> <p>However the Company has given us the explanation that the said delay was occurred due the COVID-19 Pandemic and assured the compliance in future.</p>
2.	Shareholding Pattern - Regulation 31 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.	Delay in filing Shareholding Pattern.	<p>Shareholding pattern for March, 2020 Quarter was required to be filed with Stock Exchange on or before 15th May, 2020 but it was filed on 1st June, 2020.</p> <p>However the Company has given an explanation that the said delay was occurred due the COVID-19 Pandemic and assured the compliance in future.</p>

3.	Filing of Annual Reports in XBRL Mode- Circular no. LIST/COMP/40/2018-19	Non - filing of Annual Reports in XBRL Mode	The Company has not filed the Annual Reports in XBRL Mode for FY 2019-20. However, the Company has filed the Annual Report with MSE in PDF format as required under Regulation 34 of SEBI (LODR) Regulations, 2015.
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- (a) 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 my/our examination of those records.
- (b) 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
- (c) The reporting of actions by the listed entity to comply with the observations made in previous reports -

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 23 (9) of SEBI (LODR), 2015.  The Company did not file the related party disclosures with Stock Exchange within 30 days from the date of publication of its financial results for the half year ended March 2019 & September 2019.	No Observations made as the Company has made timely disclosures to the Exchange.	The Company has made timely disclosures to the Exchange during the current reporting period.	The Company has complied with the said Compliance in the reporting Financial year.
2.	Regulation 30 and 33 of The SEBI (LODR) Regulations, 2015 - Financial Results.  The Company had uploaded its financial result for quarter and year	No Observations made as during the reporting financial year, the Company has made timely disclosure to the Exchange.	The Company has made timely disclosures to the Exchange during the current reporting period.	The Company has complied with the said Compliance in the reporting Financial year

	<p>ending March 2019 on 06th June, 2019 which is beyond sixty days from the end of the financial year.</p> <p>Also there was delay in filing outcome of Board meeting. The Board concluded at 10:45 PM and the Company filed outcome of the said meeting at 11.45 PM which is beyond 30 minutes from closure of meeting.</p> <p>The Stock exchanged levied Fine for non-compliance of Regulation 33 i.e. non-filing of Financial results within prescribed time and the fine was duly paid by the Company.</p>			
3.	<p>Closure of Trading Window as per SEBI (Prohibition of Insider Trading) Regulations, 2015</p> <p>The trading window of the Company was not closed from the beginning of the quarter; However, the Company has closed the said trading window from the date of intimation/Notice of Board meeting for approval of accounts for quarter ended 31st March, 2019, 30th June,</p>	<p>In the current reporting period also there was a delay in intimation of Trading Window Closure for June, 2020 Quarter. For June, 2020 Quarter intimation of Trading Window Closure should have been made before 1st July, 2020 but same has been done on 3rd August, 2020 to the Exchange.</p>	<p>The Company has closed the trading window from the beginning of the quarter during the current reporting period except for the June, 2020 Quarter.</p>	<p>The Company has closed the trading window from the beginning of the quarter during the current reporting period except for the June, 2020 Quarter.</p>

	2019, 30th September, 2019, 31st December, 2019			
4.	Regulation 74 (5) of SEBI (Depositories & Participants) Regulations, 2018.  The Company has not filed the said certificate in FY 2019- 20	No observation for the same is made in the report for the same as timely disclosures has been made in the current reporting period.	The Company was careful in the reporting Financial year.	The Company has complied with the said Compliance in the reporting Financial year.
5.	Compliance Certificate Regulation 7 (3) of SEBI (LODR) Regulations, 2015.  The Company has not filed the said certificate for March, 2020 quarter.	No observation for the same is made in the report.	The Company submitted the required certificate received from RTA during the reporting financial year.	The Company has complied with the said Compliance in the reporting Financial year
6.	Regulation 20(3A) Meeting of Stakeholder Relationship Committee.  No meeting of stakeholder relationship committee was convened during FY 2019-20.  However, the Company has explained us that due to COVID-19 pandemic, the members of the Stakeholder relationship committee did not meet for its meeting scheduled during March 2020 and was duly convened on 15th July, 2020.	During the reporting Financial year the Company has duly convened the meeting of Stakeholder Relationship Committee.	The Company was more careful in the reporting Financial year.	The Company has complied with the said Compliance in the reporting Financial year.
7.	Regulation 44 Of	No Observation	The Company was	The Company

	<p>The SEBI (LODR) Regulations, 2015 – Intimation Date of closure of transfer books.</p> <p>The Company has not intimated Book Closure date/Transfer of Books date to the Stock Exchange.</p>	made during the current reporting period.	more careful in the reporting Financial year.	has complied with the said Compliance in the reporting Financial year.
8.	<p>Initial Disclosure to be made by an entity identified as a Large Corporate.</p> <p>The Company did not make disclosure of Non applicability to Stock exchange within 30 days from end of Financial year 2019 and 2020.</p> <p>However, the Company has explained us that the Company is not identified as large corporate and the same is being filed.</p>	No Observation made during the current reporting period.	The Company has complied with the said Compliance in the reporting Financial year.	The Company has complied with the said Compliance in the reporting Financial year.
9.	<p>Regulation 25 (2) Tenure of Independent Director not taken in Annual general meeting.</p> <p>The tenure of Independent Director Mr. Nagesh Jagtap and Mr. Ganpathy Dharmarajan was valid till 2019. The re-appointment of the Independent Director was not taken in the Annual General Meeting held in 2019.</p>	No observation is made during the current reporting period as both the Independent directors have resigned during the Financial Year.	Both the Independent directors have resigned during the current Financial Year.	Both the Independent directors have resigned during the current Financial Year.

10.	Regulation 13(3)-Statement of Investor Complaints.  There was delay of 6 days in filing statement of Investor complaints for the quarter ending March 2020.	No Observation made during the current reporting period	The Company has made the timely disclosure during the current reporting period.	The Company has made the timely disclosure during the current reporting period.
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**Date: 30/06/2021**

**Place: Mumbai**

**For Mayank Arora & Co.**

**Company Secretaries**

**(ICSI Unique Code S2014MH267200)**

**MAYANK  
ARORA**

Digitally signed by MAYANK ARORA  
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serialNumber=445c176a8a6339ef33cb388a  
60e393270b2863c3b77a87214e38649449  
c1c4c, cn=MAYANK ARORA  
Date: 2021.06.30 12:32:07 +05'30'

**Mayank Arora**

**Proprietor**

**FCS No. 10378**

**C.P. No. 13609**

**PR No. 679/2020**

**UDIN: F010378C000547541**

*Note: Due to COVID19 pandemic impact and lockdowns being announced by various State Governments, the compliance documents for the review period were obtained through electronic mode and verified with requirements.*