

Date: 30.05.2023

To,
The Listing Department
BSE Limited
The Stock Exchange, Mumbai
PhirozeJeejeebhoy Tower
Dalal Street
Mumbai- 400001

Dear Sir/Madam,

#### Ref:Scrip Code: 511628

**SUB: Annual Secretarial Compliance Report** 

Sir/Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report for the yar ended March 31, 2023.

This is for your information and records.

Thanking You
Yours faithfully
For IM+ CAPITALS LIMITED

SAKSHI GOEL COMPANY SECRETARY & COMPLIANCE OFFICER



Encl: Compliance Report issued by the Practising Company Secretary.



Company Secretaries (A commercial unit of SCS Group)

Off.: D-66, Chhattarpur Enclave I, Delhi – 110074 376/12, Multani Chowk, Hisar, Haryana - 125001 Contact: 011-41675353; +91-7988842449

Email: csshukraa@gmail.com; chetnabhola@gmail.com

May 30, 2023

To
The Board of Directors
IM+ Capitals Limited
72, Ground Floor, World Trade Center
Babar Road, Connaught Place, New Delhi,
Delhi – 110001

#### SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

We have been engaged by IM+ Capitals Limited (CIN: L74140DL1991PLC340407), 72, Ground Floor, World Trade Center, Babar Road, Connaught Place, New Delhi, Delhi – 110001, to conduct an audit and issue Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the company with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and issue a report thereon.

The Audit was conducted in accordance with the Guidance Note on Secretarial Compliance Report issued by the Institute of Company Secretaries of India ("ICSI").

Secretarial Compliance Report is enclosed herewith.

For M/s Chetna Bhola & Associates Company Secretaries

M. No.: 41283 C.P. No.: 15802 Peer Review No.: 2573/2022

Chetna Bhola Partner

Mem. No.: A41283 C.P. No.: 15802

UDIN: A041283E000387101

Date: May 30, 2023 Place: New Delhi



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#### SECRETARIAL COMPLIANCE REPORT OF IM+ CAPITALS LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

#### We have examined:

- (a) all the documents and records made available to us and explanation provided by IM+ Capitals Limited (CIN: L74140DL1991PLC340407), a Company incorporated under Companies Act, 1956 having registered office at 72, Ground Floor, World Trade Center, Babar Road, Connaught Place, New Delhi – 110008 ("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, 2023 ("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, as amended from time to time;
- (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 as there was no reportable event during the period under review]
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity)Regulations, 2021; [Not Applicable as there was no reportable event during the period under review]
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;[Not applicable to the Company during the review period]

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





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We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: 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.	Yes	
2.	Adoption and timely Updation of the Policies:     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 & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	
3.	Maintenance and disclosures on Website:  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 re-directs to the relevant document(s)/section of the website	Yes	
4.	Disqualification of Director:  None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes, none of the Directors are disqualified.	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.:  (a) Identification of material subsidiary companies  (b) Disclosure requirement of material as well as Other subsidiaries	Yes	
6.	Preservation of Documents:  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.	Yes	



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
7.	Performance Evaluation:  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8.	Related Party Transactions:  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	N.A.	No such event reported during the period under review.
9.	Disclosure of events or information:  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	
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(s), if any:  No action(s) 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 thereunder except as provided under separate paragraph herein (**).	Yes, except in the matters as stated in this compliance report	
12.	Additional Non-compliances, if any:  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes, except in the matters as stated in this compliance	

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
		report	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation s /Remarks by PCS*
1.	Compliances with the following conditions while appointing	re-appointing an	auditor
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	N.A.	No such event reported during the period under review.
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or		
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.		
2.	Other conditions relating to resignation of statutory auditor		





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	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	N.A.	No such event reported during the period under review.
	a. In case of any concern with the management of the listed entity/ material subsidiary such as non- availability of information/non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information/explanation from the company, the auditor has informed the Audit Committee the details of information/explanation sought and not provided by the management, as applicable.		
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the audit or relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.		
	ii. Disclaimer in case of non-receipt of information:		
	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI/NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	N.A.	No such event reported during the period under review.

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(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.	(1)	1.																
Requirement(Regulations/ circulars/ guide- lines including specific clause)	(2)	The listed entity shall	submit a quarterly	compliance report on	corporate governance	in the format as	specified by the	Board from time to	time to the	recognised stock	exchange(s) within	Fifteen days from the	end of each quarter					
Circular No.	(3)	Regulation	27(2) of the	SEBI (LODR)	Regulations,	2015												
Deviations	<b>(</b>	Delayed	submission of	Corporate	Governance	report												
Action Taken by	(5)	BSE																
Action	(6)	Fine								1 Line								
Details of Violation	(7)	The listed entity	were made delayed	submission of	Corporate	Governance report									22			
Quarter	(8)	For the	quarter	ended	December	31,2015												
Amount (₹)	(9)	1,000																
Waived Amount (₹)	(10)	1,000																
Observations/Remarks Management Remarks of the Practicing response Company Secretary	(11)	The Company received	a mail on 03 <sup>rd</sup>	February, 2023 for the	fine imposed by the	exchange related to	Corporate Governance	Report for the quarter	ended December, 2015	and the Company same	day made a reply to the	stock exchange that the	Company has	submitted the Report	timely on 15.01.2016	and BSE on 06th	February, 2023 replied	that As per
Management response	(12)	:																
Remark	(13)														124	+0	10)	SO LAR

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		e Viel																				9			No.	Sr.
	the Company, other	issued by the	review re	quarter along with		ty-five/Sixty	exchange within	the	standalone financial	year-to-date	terly and	_	-									(2)		lines including specific	Requirement(Regulati	Compliance
								2015	Regulations,	(LODR)	SEBI	_	-									(3)				Regulation/
						2018	ended March 30,	for the quarter	financial results	the unaudited	submission of											(4)			To the same of the	Deviations
												BSE										(5)			by	Action Taken
												Fine										6			Action	Tunnant
		Regulations, 2015	the SEBI (LODR)	Regulation 33 of	terms of	March 31, 2018 in	quarter ended	results for the	unaudited financial	submission of	were made delayed	The listed entity										(3)			Details of A lotation	Datalle of Violation
								2018	March 31,	ended	quarter	For the										(8)	×		Month	2
												3,60,016										(9)		3	Amount	Eta.
		1955					GW					N:										(10)		3	2 2	
	made a reply to the stock exchange that the	the Company same day	ended March, 2018 and	2015 for the quarter	(LODR) Regulations,	(Regulation 33 of SEBI	Financial Results	exchange related to	fine imposed by the	February, 2023 for the	a mail on 03 <sup>rd</sup>	The Company received	will be levied.	due date) hence no fine	On 15.01.2016 (within	December 31, 2015.	the quarter ended	Regulation 27(2) for	submitted the	company had	acknowledgement the	(LLD)		Company Secretary	of the Practicing	
Page 9 of 26	HDFCR52023 02078101546	vide UTR No.	(March 2018)	Results	Financial	Regulation 33	(incl. GST) for	Rs. 4,24,819/-	payment of	made the	entity had	The listed										(12)			response Remarks	
	COM	+0										1										(13)			Kemarks	Agreement and the second second
TMY SECRET	C.P. No. 15802	Š	くなりしなっ	NAO																						



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Requirement(Regulations/circulars/guide- lines including specific clause)	(2)	than the last quarter																					
Circular No.	(3)																						
	(4)																						
Ŋ.	(5)																						
Action	6																						
	(7)	(3)																					
Month	(8)	(9)																					
Amount (?)	(9)	(3)																					
Amount (₹)	GD	(10)																			, h		S
Company Secretary	(11)	(11)	Company has	submitted the Report	timely on 30.05.2018	(Acknowledgement	attached) and BSE Ltd	on 06th February, 2023	replied that It may be	noted that on	30.05.2018 the	company had	submitted incomplete	financial result	(newspaper copy)for	quarter/year	The complete financial	result as per format	was submitted on	3rd August	2018. Hence, fine was	levied upto date of	submission as per SEBI
response	(12)	(12)	2 dated	07.02.2023.																			
Remarks		(13)																			1	O CB 100: 41283	0



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			μ	3	No.
, other larter	forty-five days of end of each quarter along with limited review report issued by the Statutory Auditors of the	te financial the stock	The listed entity shall	chuse) (2)	Computance Requirement(Regulati ons/ circulars/ guide-
			Regulation 33	(3)	Regulation/ Circular No.
	2021	submission of the unaudited financial results for the quarter		(4)	Deviations
		DSE	2007	9	Action Taken by
		r me	1	(6)	Type of Action
	quarter ended March 31, 2018 in terms of Regulation 33 of the SEBI (LODR) Regulations, 2015	were made delayed submission of unaudited financial results for the		Э	Details of Violation
		For the quarter ended June 30, 2021	-	(8)	Quarter/ Month
		40,000		(9)	Fine Amount (₹)
		<u> </u>		(10)	Waived Amount
the said cmail communication/letter, i.e. September 14, 2021 and The Company has paid the Fine of Rs.	47,200/- (Rupces Forty-Seven Thousand Two Hundred Only) to be paid by the company within 15 (fifteen) days of date of	BSE vide cmail dated 14.09.2021 vide Ref No. SOP-(Review-September-2021) has imposed a fine of Rs.	SOP Circular. Hence, company is required to pay the fine of Rs.424819/- (incl. GST).	(11)	Observations/ Remarks of the Practicing Company Secretary
submitted the Financial Results for the quarter ended June 30, 2021	dated September 17, 2021 clarified the BSE that the Company have	In response to the above non- compliance, the Company vide its reply		(12)	Management response
AAMOO¥CY		ı		(13)	Remarks



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	3	No.
	(2)	Compliance Requirement(Regulati ons/ circulars/ guide- lines including specific clause)
	(3)	Regulation/ Circular No.
	(4)	Deviations
	(5)	Action Taken by
	(6)	Type of Action
	(7)	Details of Violation
	(8)	Quarter/ Month
	(9)	Fine Amount (?)
	(10)	Waived Amount (₹)
Forty-Seven Thousand Two Hundred Only) on 29.06.2022.	(11)	Observations/ Remarks of the Practicing Company Secretary
Company on the date of Board meeting itself i.e. August 12, 2021 and shared a copy of acknowledge ment for the said submission.  And The Company has paid the Fine of Rs. 47,200/- (Rupees Forty-Seven Thousand Two Hundred Only) on	(12)	Management response
3 dy S ≥ The	(13)	Remarks
M. VO. 41 NO. 15		



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										_			_	_	_			_	_			
																	4.		Θ			No.
				the last quarter	Company, other than	Auditors of the	Statu	ew rep	along with limited	end of each quarter	forty-five days of	exchange within	=	standalone financial	year-to-date	submit quarterly and	The listed entity shall		(2)		ons/ circulars/ guide- lines including specific clause)	Compliance Requirement/Regulati
													2015	Regulations,	(LODR)	of the SEBI	Regulation 33		(3)			Regulation/
										2022	September 30,	ended	for the quarter	financial results	the unaudited	submission of	Delay in		(4)			Deviations
×																	BSE		(5)		Ş	Action Taken
																	Fine		(6)		Action	Type of
							Regulations, 2015	the SEBI (LODR)	Regulation 33 of	2022in terms of	September 30,	quarter ended	results for the	unaudited financial	submission of	were made delayed	The listed entity		Э			Details of Violation
													30,2022	September	ended	quarter	For the		(8)		Month	_
																	5000		(9)		(3)	Fine
																	1		(10)	***	3	Waived
Nine Hundred Only) on 15.12.2022.	Fine of Rs. 5900/-	Company has paid the	29, 2022 and The	letter, i.e. December	email communication/	of date of the said	within 15 (fifteen) days	paid by the company	inclusive of GST to be	Hundred Only)	Thousand Nine	5,900/- (Rupees Five	imposed a fine of Rs.	December 2022 has	No. SOP-CReview-	14.12.2022 vide Ref	BSE vide email dated The Company		(11)		Company Secretary	Observations/ Remarks Management Remarks
									15.12.2022.	Only) on	Nine Hundred	Thousand	(Rupees Five	5900/-	Fine of Rs.	has paid the	The Company	29.06.2022.	(12)		response	Management
NO2 ¥ C	's'																E		(13)			Remarks

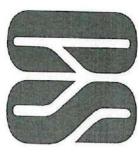


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																							5.	3	No.
the changes shall be	and explanation for	with the details of	revised copy along	annual report, the	any changes to the	(o) in the event of	ona choices,	ere:		commencement of	than the day of	meeting not later	of the annual general	along with the notice	the shareholders	annual report sent to	(u) u copy or unc	(a) a conv of the	website-	publish on its	exchange and	submit to the stock	The listed entity shall	(2)	Compliance Requirement(Regulati ons/ circulars/ guide- lines including specific clause)
																			2015	Regulations,	SEBI (LODR)	34(1) of the	Regulation	(3)	Regulation/ Circular No.
																	IVIAICH 31, 2022	2	year ended	for the financial	Annual Report	submission of	Delay in	(4)	Deviations
																							BSE	(5)	Action Taken by
																							Fine	(6)	Type of Action
																2022	ended March 31,		the financial year	Annual Report for	submission of	were made delayed	The listed entity	9	Details of Violation
																		1011		March 31,	year ended	financial	For the	(8)	Quarter/ Month
																							2,000	(9)	Fine Amount (?)
W H	N	0.5				- 10																	NI	(10)	Waived Amount (7)
meeting was 29 <sup>th</sup> September 2022. The	_	on 05th September	have submitted the	_	before the Annual	sharcholders not less	Annual Report to its	required to send the	replied that Company is	letter dated 31.10.2022	i.e. November 05, 2022	communication/letter,	the said email	(fifteen) days of date of	to be paid by the	Only) inclusive of GST	Three Hundred Sixty	(Rupees Two Thousand	fine of Rs. 2360/-	2022) has imposed a	SOP-CReview-(21-Oct-	21.10.2022 vide Ref	BSE vide email dated	(LL)	Observations/ Remarks of the Practicing Company Secretary
05 <sup>th</sup>	on BSE on	Annual Report	submitted the	have	Meeting. We	General	the Annual	days before	9	fwanty one	not less than	shareholders	to its	Annual Report	send the	required to	Company is	repried mat	3	31.10.2022		vide letter	The Company	(12)	Management Remarks response
	(A)	SING	00	*	CA																			(13)	Remarks
OF	3			N No ·	1	TZZA																			



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T: D-66 Chhattarnur Enclave I Delbi - 110074

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	Ξ	No.
sent not later than 48 hours after the annual general meeting.	(2)	Compliance Requirement(Regulati ons/ circulars/ guide- lines including specific clause)
	(3)	Regulation/ Circular No.
	<b>(£</b>	Deviations
	3	Action Taken by
	6)	Type of Action
	9	Details of Violation
	(8)	Quarter/ Month
	(9)	Fine Amount (₹)
	(01)	Waived Amount (₹)
Annual Report was provided to the sharcholders alongwith the Notice of Annual General Meeting before the prescribed period (i.e. before 23 days. Copy of Acknowledgement of the submission of Annual Report is enclosed for your reference and the Company has paid the Fine of Rs. 5900/-(Rupees Five Thousand Nine Hundred Only) on 09.11.2022.	(11)	Observations/ Remarks of the Practicing Company Secretary
September, 2022 and the date of the meeting was 29th September 2022. The Annual Report was provided to the shareholders alongwith the Notice of Annual General Meeting before the prescribed period (i.e. before 23 days. Copy of Acknowledge	(12)	Management Remarks response
181100 * CK	(13)	Remarks
M. No.: 41283 C.P. No.: 15802		



Company Secretaries (A commercial unit of SCS Group)

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Email: csshukra@gmail.com; chetnabhola@gmail.com

ten 17 SE Rej							_							3	F - 1
of Regulation of the BI(LODR) gulations, 2015														(2)	ons/ circulars/ guide- lines including specific clause)
Regulations, 2015	Regulation 17(1) of the SEBI(LODR)													(3)	e Chemat No.
observed that as per the latest shareholding pattern report	BSE vide mail dated Fri, Mar 5, 2021 it is													(4)	
	BSE												;	(5)	у
	Fine												3	9	Action
Regulation 17(1) of the SEBI (LODR) Regulations, 2015	Composition of Board in compliance of												3	9	
December 31, 2020	For the quarter ended												(6)	(8)	Month
	1,88,800												9	(0)	Amount (7)
	1,88,800												(ar)	(10)	Amount (3)
	BSE Limited vide its email dated March 05, 2021 informed the												(m)		of the Practicing Company Secretary
lay sta any's	BSE vide mail dated 05th July	Only) on 09.11.2022.	Three Hundred Sixty	Thousand	of Rs. 2360/-	paid the Fine	ipany	and the	your reference	is enclosed for	Annual Report	submission of	(12)		response
OO ¥ CAA													(13)		-

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WY SECRE



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, Z	Ξ																							L
Requirement(Regulations/circulars/guide- ons/circulars/guide- lines including specific chause)	(2)																							
Circular No.	(3)																							
Criations	(4)	the promoter	name has been	included in the	list of promoters	of the comment	me com	and also	miornieu mat an	ule promoters	demai accounts	опи ое по	in the	7		and lines not	paid.							
by	(5)																							
Action	(6)																							
Details of Violation	Ø																							
Month	(8)																							
Amount (?)	(9)																							
Amount (3)	(10)																							
Observations/ Remarks of the Practicing Company Secretary	(LI)	Regulations, 2015 and	imposed fine of De		1,88,800/- (inclusive	GST) and also	informed that all the	promoters' demat	accounts would be	frozen if the	compliance was not	completed and fines	not paid.	In reply of the above,	the listed entity sent a	communication email	to BSE Limited dated	March 08, 2021 stating		Regulation 17(1), the	Company has fulfilled	the composition of	Board of Directors and	Company
Management response	(12)	for waiver of		fine was	placed before	the	"Committee	for reviewing	representation	for Waiver of	fines levied	under	Standard	operating	Procedure	(SOP) and	pursuant to	decision of the	committee,	request for	Waiver has	been	approved.	1000
Remarks	(13)	1																					/×/M	C

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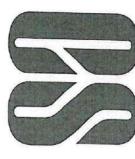
Company Secretaries (A commercial unit of SCS Group)

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Contact: 011-41675353; +91-7988842449

Email: css
hukraa@gmail.
com; chetnabhola@gmail.con

No.	3																					
Computance Requirement(Regulati ons/ circulars/ guide- lines including specific clause)	(2)																					
Circular No.	(3)																					
Deviations	(4)																					
Action Taken by	(5)																					
Type of Action	(6)																					
Details of Violation	(7)																					
Quarter/ Month	(8)																					
Fine Amount (₹)	(9)																					
Waived Amount (?)	(10)																					
Observations/ Remarks of the Practicing Company Secretary	(11)	appointed Ms. Tanya	Singhal (DIN:	08930315) as a woman	director in the board of	IM+CAPITALS	LIMITED (Scrip code:	511628) w.e.f.	02.11.2020 in place of	Mrs. Richa Mishra	(DIN:00405282) who	has resigned as a	woman director on	dated 02.11.2020	Therefore, there	question of non-	compliance does not	BSE vide mail dated	05 <sup>h</sup> July 2021 on	Tuesday stated that	Company's	representation for
Management response	(12)																					
Rema	(13)																			CA	M. No.: 41283	-



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Email: csshukraa@gmail.com; chetnabhola@gmail.com

N <sub>o</sub>	Ξ													7			e 10						
Requirement(Regulati ons/ circulars/ guide- lines including specific clause)	(2)													1	2 6	chora of	1 SHAIC	uansici agent					
Circular No.	(3)													Deculation	regulation	SEBI (I ODB)	BENT (LUDK)	Regulations,	2015				
	(4)							ŭ						Non-possible	7	regul		Securities and	Exchange Board	of India (Listing	Obligations and	Disclosure	Requirements)
by	(5)														BSE								
Action	(6)													L	Fine								
Deans of Mondon	(7)															-	the Securities and	_	India (Listing	Obligations and	Disclosure	Requirements)	Regulations, 2015
Month	(8)														For the	quarter	ended June,	2021					
Amount (7)	(9)														2360								
Amount (₹)	(10)														NIL			_					_
Observations/ Remarks of the Practicing Company Secretary	(11)	waiver of fine was	placed before the	"Committee for	reviewing	representation for	Waiver of fines levied	under Standard	operating Procedure	(SOP) and pursuant to	decision of the	committee, request for	Waiver has been	approved.	In response to the	above non-compliance,	the Company vide its	reply dated August 21,	2021 clarified the BSE	that there is no change	in the Registrar &	Share Transfer Agent	of the company and the
Management Remarks response	(12)														The Company	has paid the	Fine of Rs.	2,360/- on	09.11.2022.				
Remark	(13)														1								+0

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Email: csshukraa@gmail.com; chetnabhola@gmail.com

7.0		
No. F	3	
Computance Requirement(Regulati ons/ circulars/ guide- lines including specific clause)	(2)	
Circular No.	(3)	
Deviations	(4)	Regulations, 2015
Action Taken by	(5)	
en Type of Action	6	
Details of Violation	9	
Quarter/ Month	39	
Fine Amount (7)	9	
Waived Amount (7)	(10)	
Observations/ Remarks   Management   Remarks   of the Practicing   response   Company Secretary	(II)	Company has paid the Fine of Rs. 2,360/- on
Management response	(12)	
Remarks	(E)	





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# (b) The listed entity has taken the following actions to comply with the observations made in previous reports:

	- 3	Sr. No.
	Disclosures of	Con Requ (Regulati /guidelin specif
21 S 65	Schedule III	Regu
IIIPart A - Disclosures of Events or Information - Specified Securities The following shall be events/informati on, upon occurrence of which listed entity shall make disclosure to Stock Exchange(s)-Change in directors, key munagerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Chief Financial Officer, Company Secretary,	(4)	Deviations
	(5)	Action Taken by
ı	(6)	Type of Action
Company has appointed Ms. Sakshi Goel as Company Secretary on June 30, 2021 and made delayed submission to BSE Limited ("BSE") on July 03, 2021	(7)	Details of Violation
2021 2021	(8)	Quarter / Month
1	(9)	Fine Amount (₹)
1	(10)	Waived Amount (₹)
The Company has appointed Ms. Sakshi Goel as Company Secretary on June 30, 2021 and made delayed submission to BSE on July 03, 2021.	(11)	Observations/ Remarks of Management the Practicing Company response Secretary
1	(12)	f Management response
D*C4	(13)	Remarks

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TANY SECRY

C.P. No.: 15802

M. No.: 41283

KINA BHO



Company Secretaries (A commercial unit of SCS Group)

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	i		ε	
	Intimation w.r.t. the appointment of Registrar and share transfer agent		(2)	Requirement (Regulations/circulars /guidelines including specific clause)
("BSE"), vide Ref No. SOP- (Review-20 Aug-2021)	Regulation 7(1) of the SEBI (LODR) Regulations, 2015 BSE Limited		(3)	Circular No.
Obligations and Disclosure Requirements) Regulations, 2015	Non- compliance of regulation 7(1) of the Securities and Exchange Board of India (Listing	etc.), Auditors and Compliance Officer. The Company has appointed Ms. Sakshi Goel as Company Secretary on June 30, 2021 and intimated the same to BSE Limited ("BSE") on July 03, 2021.	(4)	
	BSE		(5)	by
	Fine		(6)	
imposed a fine of Rs. 2,360/- (Rupees Two Thousand Three Hundred Sixty Only) to be paid by the company within 15 (fifteen) days of date of the said email	BSE vide email communication dated August 20, 2021 vide Ref No. SOP-(Review-20 Aug-2021) has		(7)	Violation
	= 1		(8)	Month
	2,360		(9)	Amount (₹)
	3		(10)	Amount
Thousand Three Hundred Sixty Only) to be paid by the company within 15 (fifteen) days of date of the said email communication/ letter, i.e. August 20, 2021 for Non-appointment of Share Transfer Agent.  Since, we observed that	BSE vide email communication dated August 20, 2021 vide Ref No. SOP- (Review-20 Aug-2021) has imposed a fine of Rs.2,360/- (Rupees Two		(11)	the Practicing Company response Secretary
reply dated August 21, 2021 clarified the BSE that there is no change in the Registrar & Share Transfer	In response to the above non-compliance, the Company vide its		(12)	response
OX CA	1		(13)	



# CHETNA BHOLA & ASSOCIATES

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				15541	9,50	507		200								ب								ε	3		
Company, outer than	Company other than	Auditors of the	oy une saminary	by the Statutory	review report issued	along with limited	about miss quanta	end of each quarter	forty-five days of	Cycligings WITH	_	results to the stock	standalone financial	year-to-date	rterly and	_								(Z)	specific clause)	/guidelines including	Requirement
												Page 1	Regulations,	(LODR)	of the SEBI									(3)			Circular No.
									2021	ended June 30,	rot and duality	for the quarter	financial results	the unaudited	submission of	Delay in								(4)			
																BSE								(5)			by
			2712													Fine								(6)			, ,
within 15 (fifteen) days of	the company	e	ишиси ощу)	Hundrad Onlea	Two	Seven Thousand	ecs.	Rs 47 200/-	of	, ,	2021) has	September-	SOP-(Review-	Ref No	dated	BSE vide email				rimisici Agelit	of Share	ointmer	August 20, 2021 for Non-	(7)			Violation
													00, 4041	ended June	quarter	For the					=			(8)			Month
							_									47,200								(9)		3	Amount
																1								(10)		3	Amount
fine of		said submission. The	acknowledgement for the	shared a copy of	gust 12, 2021	of Board meeting itself	the Company on the date	cined June 30, 2021 OI	Results for the quarter	submitted the rinancial	mat the Company have	that the Grantied the BSE	dated September 17,	my vide its n	non-compliance, the	In response to the above	The Company had also deposited fine of Rs. 2,360/- as imposed by the BSE on 09.11.2022.	Registrar & Share Transfer Agent.	clarified the BSE that	Company vide its reply	compliance, the	to the above non-	Transfer Agent and the	(11)	33	Secretary	the Practicing Company response
																1							company	(12)		espunse	Management
SINC	00 CP	) X		CA		1																		(13)			Remarks

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Company Secretaries (A commercial unit of SCS Group)

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																									4.					3			
												same on its website	ume, and publish the		Board from time to	specified by the	- 5	the format	every six months in	party transactions in	disclosures of related	_		submit to the stock	The listed entity shall				the last quarter	(2)	specific clause)	/guidelines including	Requirement
							_													2015	Regulations,	эвы (шорк)	2	23(9)of the	Regulation					(3)			Circular No.
								company.	on me	narea OI	-	-	85	-	230 100/ KS.	-		HOEL,	Sentember	ball or the	the Regulation	complied with	complied /late	has non-	The company					(4)			
																									BSE					(5)		9	by
			The state of the s																						Fine					(6)			
	on the Company	(inclusive GST)	0,100/-	of Rs.	ĭal	Limited had	which BSE	basis" against	consolidated	Transactions on	Related Party	disclosure of	compliance with	respect to "Non-	2015 with	Regulations,	Requirement)	Disclosure	Obligations and	SEBI (Listing	23(9) of the		provisions of	≨.	The Company	September 14,	communication/	said cmail	date of the	(7)		Section 200 to the Administra	Violation
																					30, 2020	September	ended	quarter	For the					(8)			Month
																								2,00,100	2 30 100					(9)		3	Amount
_																								2,00,100	2 30 100					(10)	ē	3	Amount
d b	operating Procedure	levied under Standard	for Waiver of fines	reviewing representation	the "Committee for	of fine was placed before	escntation	that Company's	20th July, 2021 stated	BSE vide mail dated		September 30, 2020.	the half year ended	party transactions during	а апу ге	হ _	S		that - "As per the	January, 2021 stating	BSE Limited dated 21st	communication email to	and anon,	G				HIG BOD ON 29,00,2022.	the BSE on 20 06 2022	(II)		Secretary	the Practicing Company response
																								1						(12)		reporter	Management
0	*/M No: 41283	14	100	ANA																				1					1	(13)			Remarks

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WY SECR



Company Secretaries (A commercial unit of SCS Group)

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or. No.	3		<u>.</u>
Requirement (Regulations/circulars /guidelines including specific clause)	(2)		Board of Directors
Regulations/ Circular No.	(3)		regulation 17(1) of the SEBI (LODR) Regulations, 2015
Deviations	(4)		had not appointed woman Director on the Board and violated the provisions of the Regulation 17 of the SEBI (LODR) Regulations, 2015
Action Taken by	(5)		S. S.
Type of Action	(6)	-2	Finc
Details of Violation	(7)		The Company had not appointed woman Director on the Board and violated the provisions of the Regulation 17 of the SEBI (LODR) Regulations, 2015.  BSE vide mail dated Fri, Mar 5, 2021 it is observed that as per the latest shareholding pattern report the promoter name has been included in the list of promoters of the Company and also informed that
Quarter / Month	(8)		March, 2021
Fine Amount (₹)	(9)		1,88,800
Waived Amount (₹)	(10)		
Observations/ Remarks of   Management the Practicing Company response Secretary	(11)	Waiver has been approved.	The Company has fulfilled the compliance requirement of composition of the Board of Directors by appointing Ms. Tanya Singhal (DIN:08930315) as the Woman Director on the Board of the listed entity w.e.f. 02.11.2020 in place of Mrs. Richa Mishra (DIN: 00405282) who was resigned as the Independent Woman Director on 02.11.2020 and deposited the fine.
Management response	(12)		£
Remarks	(13)		The state of the s



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	Ξ	
Requirement (Regulations/circulars /guidelines including specific clause)	(2)	
Circular No.	(3)	
DEVILIDAS	(4)	
by	(5)	
Type of Action	(6)	
Violation	(7)	would be frozen if the compliance was not completed and fines not naid
Quarter/ Month	(8)	
Amount (₹)	(9)	
Waived Amount (₹)	(10)	
Observations/ Remarks of Management Remarks the Practicing Company response Secretary	(LE)	
Management response	(12)	
Remarks	(13)	

Date: May 30, 2023 Place: New Delhi

For M/s Chetna Bhola & Associates

CARINA BHO Company Secretaries Peer Review No.: 2573/2022

Chetna Bhola Partner

C.P. No.: 15802

M. No.: 41283

WY SECRE

Mem. No.: A41283

UDIN: A041283E000387101 C.P. No.: 15802