

# SARVOTTAM FINVEST LIMITED

Regd. Office : 3, Bentinck Street, 2nd Floor, Kolkata - 700 001  
Ph. : (033) 2210 0875, e-mail : sarvottamfinvest@gmail.com  
CIN : L65993WB1978PLC031793 Website : www.sarvottamfinvest.in

Date: 30/05/2022

To  
The Secretary  
The Calcutta Stock Exchange Ltd.  
7, Lyons Range  
Kolkata - 700 001

To  
BSE Corporate Compliance & Listing Centre  
BSE Limited  
P. J. Towers, Dalal Street  
Mumbai - 400001

Scrip Code: 10012144  
ISIN No: INE822Q01015

Scrip Code: 539124  
ISIN No.: INE822Q01015

Sub: Annual Secretarial Compliance Report for the year ended on 31st March, 2022 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 8, 2019, we enclose herewith copy of Annual Secretarial Compliance Report issued by Mr. Rajesh Ghorawat, Practicing Company Secretary (COP No.20897), for the year ended on 31st March, 2022.

Kindly, take the same on the record

Thanking you

Yours Faithfully,  
For Sarvottam Finvest Limited

  
Pooja Sethia  
Company Secretary



**RAJESH GHORAWAT**  
**PRACTISING COMPANY SECRETARY**

68, R.K.CHATTERJEE ROAD,  
KASBA BAKULTALA, 3<sup>RD</sup> FLOOR,  
KOLKATA-700042  
MOBILE- +91 9831189994  
Email [Id-rgadvisory18@gmail.com](mailto:rgadvisory18@gmail.com)

Secretarial Compliance Report of  
**Sarvottam Finvest Limited**  
for the year ended 31.03.2022

I, Rajesh Ghorawat, Company Secretary (COP No.20897), have examined:

- (a) All the documents and records made available to us and explanation provided by **Sarvottam Finvest 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 documents/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31.03.2022 ("Review Period") in respect of compliances with the Provisions of:

- (i) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, guidelines issued thereunder; and
- (ii) 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 **to the extent of Acts/provisions of the Acts applicable to the company** include:

- (a) Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **[ Not Applicable during the review period ]**
- (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 during the review period ]**

**RAJESH GHORAWAT**  
**PRACTISING COMPANY SECRETARY**

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [ **Not Applicable during the review period** ]
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [ **Not Applicable during the review period** ]
- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; [ **Not Applicable during the review period** ]
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and 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 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
N.A.	N.A.	N.A.	N.A.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity / its promoters / directors / material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.
N.A.	N.A.	N.A.	N.A.	N.A.

**RAJESH GHORAWAT**  
**PRACTISING COMPANY SECRETARY**

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

Sr. No.	Observations of the Practising Company in the previous reports	Observations made in the secretarial compliance report for the year ended...	Action taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	Action taken by BSE for Non-Compliance under Regulation 23(9) of the SEBI (LODR) Regulations, 2015 within the time limit prescribed	2021	Compliance under Regulation 23(9) of the SEBI (LODR) Regulations, 2015 was done and fine was waived off by BSE on the request of the company.	NIL

*Rajesh Ghorawat*  


**Rajesh Ghorawat**  
**Practising Company Secretary**  
**M.No. F7226**  
**CP No. 20897**

Place: Kolkata  
Date: 30/05/2022

(UDIN: F007226D000425171)