



(Formerly known as Meenakshi Enterprises Limited)  
A NBFC listed at Bombay Stock Exchange

**CIN: L51102TZ1982PLC029253**

Regd Office: Shop No 3, 1st Floor, Adhi Vinayaga Complex,  
No 3 Bus stand, Gopalsamy Temple Street, Ganapathy,  
Coimbatore, Tamil Nadu, India-641006  
Email: investor@jmjfintechltd.com  
Mob:7395922291/92

**Date: 26.05.2025**

**To**  
**Department of Corporate Services**  
**Bombay Stock Exchange Limited**  
**22nd Floor, PhirozeJeeBhoy Towers**  
**Dalal Street, Mumbai - 400 001**

**Scrip Code: BSE: 538834**

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2025**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March 2025.

Kindly take the same on record and acknowledge the receipt.

Thanking You,  
Yours faithfully,  
For **JMJ FINTECH LIMITED**

**VIDYA DAMODARAN**  
**COMPANY SECRETARY AND COMPLIANCE OFFICER**  
**Membership No: A69509**



Secretarial Compliance Report of M/s. JMJ Fintech Limited for the  
financial year ended 31<sup>st</sup> March 2025.

We, Lakshmi Subramanian and Associates, have examined:

(a) all the documents and records made available to us and the explanation provided by  
M/s. JMJ Fintech 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 Report  
for the financial year ended 31<sup>st</sup> March 2025 ("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, and  
guidelines issued thereunder; and

(b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder, and the  
regulations, circulars, and guidelines issued thereunder by the SEBI;

The Specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been  
examined, and include:

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)  
Regulations, 2015;

(b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers)  
Regulations, 2011;

(c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations,  
2018;

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations,  
2021; (Not applicable during the review period)

(g) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity)  
Regulations, 2021; (Not applicable during the review period)

(h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not  
applicable during the review period)

(i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable  
Preference Shares) Regulations, 2013 (Not applicable during the review period)



(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (Not applicable during the review period)

(k) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable during the review period)

(l) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003

(m) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.

Based on the above examination, we 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:

| S No | Compliance Requirement (Regulations/Circulars/guidelines, including specific clause) | Regulation/Circular No | Deviations | Action taken by | Type of Action | Details of the violation | Fine amount | Observations / Remarks of Practicing Company Secretaries | Management Response | Remarks |
|------|--|------------------------|------------|-----------------|----------------|--------------------------|-------------|--|---------------------|---------|
|      | NA   | NA                     | NA         | NA              | NA             | NA                       | NA          | NA   | NA                  | NA      |

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

| S No | Observations/Remarks of the Practicing Company Secretary (PCS) in the previous reports) | Observations made in the Secretarial Compliance report for the year ended 31 <sup>st</sup> March 2024 | 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 |
|------|---|---|---|---|--|---|
| 1.   | Resignation of Independent Director not disclosed to the Exchange within 24 Hours       | Resignation of Independent Director not disclosed to the Exchange within 24 Hours                     | As per SEBI Circular No. SEBI/HO/CFD/CFD-POD-1/P/CIR/2023/123 dated July 13, 2023.  | Violation of Regulation 30 of SEBI (LODR) Regulations, 2015.                                      | The Company has filed the Revised Disclosure along with the Reasons for the Delay. | No further action required.                                   |



|    |   |   |   |  |  |                            |
|----|---|---|---|--|--|----------------------------|
| 2. | A. Delay for disclosure made under regulation 30(6) of SEBI (LODR) Reg.,2015 after 24 hours of occurrence of the event or information.<br>B. Full details not provided as per SEBI Circular dated September 09, 2015 for change in Director/KMP/ Auditor/ Compliance Officer (Reason/ Date/profile/ Relationship) | A. Delay for disclosure made under regulation 30(6) of SEBI (LODR) Reg.,2015 after 24 hours of occurrence of the event or information.<br>B. Full details not provided as per SEBI Circular dated September 09, 2015 for change in Director/KMP/ Auditor/ Compliance Officer (Reason/ Date/profile/ Relationship) | As per SEBI Circular no. CIR/CFD/CMD/4/2015 dated 09/09/2015. | Violation of Schedule III of Regulation 30 of SEBI (LODR) Regulations, 2015.   | The Company has filed the Revised Disclosure along with the Reasons for the Delay. | No further action required |
| 3. | Non-submission of Disclosures of Related Party Transactions for the Half Year Ended 31.03.2021  | Non-submission of Disclosures of Related Party Transactions for the Half Year Ended 31.03.2021  | -   | Violation of Regulation 23(9) SEBI (LODR) Regulations, 2015. SOP Fine of Rs. 55,60,000 was levied by BSE and later partially waived off to Rs. 2,36,000. | The Company has paid the Fine Amount levied by BSE.                                | No further action required |
| 4. | Late submission of Financial Results for the Quarter Ended March 31.03.2015   | Late submission of Financial Results for the Quarter Ended March 31.03.2015   | -   | Violation of Regulation 33 SEBI (LODR) Regulations, 2015. SOP Fine of Rs. 5000 was levied by BSE.  | The Company has paid the Fine Amount levied by BSE.                                | No further action required |



We 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*                              |
|---------|--|-------------------------------|---|
| 1.      | <u>Secretarial Standard:</u><br><br>The compliances of listed entities are in accordance with the Applicable Secretarial Standards issued by ICSI.   | Yes                           | Nil   |
| 2.      | <u>Adoption and timely updation of the Policies:</u><br><br>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.<br>• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.  | Yes                           | Nil   |
| 3.      | <u>Maintenance and disclosures on the Website:</u><br><br>• The listed entity is maintaining a functional website.<br>• Timely dissemination of the documents/ information under a separate section on the website.<br>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific, which redirect to the relevant document(s)/ section of the website. | Yes                           | Nil   |
| 4.      | <u>Disqualification of Director:</u><br><br>None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013  | Yes                           | Nil   |
| 5.      | <u>To examine details related to the Subsidiaries of listed entities:</u><br><br>(a) Identification of material subsidiary companies.<br>(b) Requirements with respect to disclosure of material as well as other subsidiaries.  | NA                            | The listed entity does not have any Subsidiary companies. |
| 6.      | <u>Preservation of Documents:</u><br><br>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                           | Nil   |



|     |   |     |  |
|-----|---|-----|--|
| 7.  | <p><u>Performance Evaluation:</u></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 | Nil  |
| 8.  | <p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.<br/>(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>  | Yes | Nil  |
| 9.  | <p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosures (s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>  | Yes | Nil  |
| 10. | <p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>  | Yes | Nil  |
| 11  | <p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No Actions 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</p>   | NA  | Nil  |
| 12. | <p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>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 subsidiary(ies) has/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.</p> | NA  | There has been no resignation of statutory auditors during the review period in the listed entity. |
| 13. | <p><u>Additional non-compliances, if any:</u></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>  | NA  | Nil  |



We further report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations is Not Applicable (NA) to the listed entity during the review period.

Assumptions & limitations of scope and review:

1. Compliance with the applicable laws and ensuring the authenticity of documents and information furnished are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based on our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of the financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

FOR LAKSHMMI SUBRAMANIAN & ASSOCIATES  
PRACTICING COMPANY SECRETARIES

Date: 22-05-2025  
Place: Chennai



Swetha Subramanian  
Partner

FCS No: 10815

CP No: 12512

Peer Review No: 6608/2025

UDIN: F010815G000409281