



(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: 25.05.2024

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

Scrip Code: BSE: 538834

Sub: Submission of Annual Secretarial Compliance Report for the year 2023-24

Dear Sir/Madam,

Please find enclosed the Annual Secretarial Compliance Report pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February 2019 and Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the financial year ended 31st March 2024.

This is for your information and record.

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

VIDYA
DAMODARAN

Digitally signed by VIDYA
DAMODARAN
Date: 2024.05.25 10:47:10
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VIDYA DAMODARAN
COMPANY SECRETARY AND COMPLIANCE OFFICER

**Annual Secretarial compliance report of M/s. JMJ Fintech Limited for the year ended
31st March 2024**

I, N. Srividhya, have examined all the documents and records made available to me and explanation provided by M/s. JMJ Fintech Limited ("the listed entity"),

(i) the filings/ submissions made by the listed entity to the stock exchanges,

(ii) website of the listed entity,

(iii) annual returns filed with the Ministry of Corporate Affairs, which has been relied upon to make this certification,

(iv) Any other documents, as may be relevant, which has been relied upon to make this certification for the year ended 31st March, 2024 ("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 (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 (Buyback of Securities) Regulations, 2018;

(g) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;(not applicable for the year under review)

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

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



(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (Not applicable for the year under review)

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

(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 (Settlement Proceedings) Regulations, 2018 and circulars/ guidelines issued thereunder; (not applicable for the year under review)

(n) Securities and Exchange Board of India Vide Circular no: CIR/CFD/CMD1/27/2019 dated February 08, 2019.

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 except mentioned here under,

(b) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/guidelines issued thereunder insofar as it appears from our examination of those records.

(c) No Actions have been taken against the listed entity by SEBI/ Stock Exchange under the aforesaid acts/ Regulations/Circulars/Guidelines issued thereunder .

(e) The clauses 6(a) and 6(b) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 with regard to the Resignation of Statutory Auditors are not applicable for the year

I hereby report that, during the Review Period the compliance status of the Listed Entity is appended as below:

ADDITIONAL AFFIRMATIONS

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standard:</u> The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	Nil
2.	<u>Adoption and timely updation of the Policies:</u> • 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 has been reviewed & timely	Yes	Nil

	updated as per the regulations/circulars/guidelines issued by SEBI		
3.	<p><u>Maintenance and disclosures on Website:</u></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	Nil
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	yes	Nil
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	No material subsidiary
6.	<p><u>Preservation of Documents:</u></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	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 (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the</p>	Yes	Nil

	transactions were subsequently approved/ratified/rejected by the Audit committee		
9.	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	Reported Separately Hereunder	<p>1. Delay in submission of Appointment of Company Secretary and Compliance officer within 24 Hours.</p> <p>2. Delay in Submission of Resignation of Independent Director within 24 Hours.</p> <p>The Listed Entity has Uploaded the Revised Disclosures along with the Reasons for the Delay for the above mentioned Events.</p>
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 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>	Reported Separately Hereunder	Actions has been taken against the Listed Entity during the period under the review and is reported.
12.	<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



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 N o	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Regulation/Circular No	Deviations	Action taken by	Type of Action	Details of violations	Fin e am oun t	Obse rvati ons / Rem arks of Prac ticin g Com pany Secr etari es	Man age men t Resp onse	Re ma rks
1	SEBI Circular No. SEBI/HO /CFD/CFD-PoD-1/P/CIR /2023/123 dated July 13, 2023	Regulation 30 of SEBI (LODR) Regulations, 2015.	Resignation of Independent Director not disclosed to the Exchange within 24 Hours	NA	NA	Resignation of Independent Director not disclosed to the Exchange within 24 Hours	NA	The Company has Filed Revised Disclosure along with the Reasons for the Delay.	The Company has Filed Revised Disclosure along with the Reasons for the Delay.	NA
2	SEBI Circular no. CIR/CFD /CMD/4 /2015 dated 09/09/2015	Schedule III of Regulation 30 of SEBI (LODR) Regulations, 2015.	1.Delay for disclosure made under regulation 30(6) of SEBI (LODR) Reg.,2015 after 24 hours of occurrence of the event or information 2. Full details	NA	NA	1.Delay for disclosure made under regulation 30(6) of SEBI (LODR) Reg.,2015 after 24 hours of occurrence of the event or information 2. Full details	NA	The Company has Filed Revised Disclosure along with	The Company has Filed Revised Disclosure along with	NA

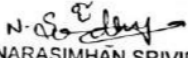
			not provided as per SEBI Circular dated September 09, 2015 for change in Director/KMP/Auditor/Compliance Officer (Reason/Date/profile/Relationship).			not provided as per SEBI Circular dated September 09, 2015 for change in Director/KMP/Auditor/Compliance Officer (Reason/Date/profile/Relationship).		the Reasons for the delay.	the Reasons for the Delay.	
3	SEBI (LODR) Regulations, 2015.	SOP-Reg-23(9)	Non-submission of Disclosures of Related Party Transactions for the Half Year Ended 31.03.2021	Fine Levied	Fine Levied	Non-submission of Disclosures of Related Party Transactions for the Half Year Ended 31.03.2021	Rs. 48,95,000	The Company has filed waiver Application for the Fine Levied and yet to receive approval from BSE.	The Company has filed waiver Application for the Fine Levied and yet to receive approval from BSE.	NA
4	SEBI (LODR) Regulations, 2015.	SOP-Reg-33	Late submission of Financial Results for the Quarter Ended March 31.03.2015	Fine Levied	Fine Levied	Late submission of Financial Results for the Quarter Ended March 31.03.2015	Rs. 5,000	The Company has paid the Fine Amount levied by BSE	The Company has paid the Fine Amount levied by BSE	NA

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

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

Place: Chennai
Date:17.05.2024

N. Srividhya
Practicing company secretaries
Membership No: A34428
CP No. 14058
Peer review certificate No.829/2020
Unique code P2004TN081200
UDIN:A034428F000391367


NARASIMHAN SRIVIDHYA
Company Secretary In Practice
Mem. No : 34428
Cop : 14058