



CIN No. L65910DL1990PLC040705

**Regd. Office:** 4, MMTC/STC Market, Geetanjali, New Delhi-110017

**Corp. Office:** 315, Square One Mall, Saket, District Centre, New Delhi-110017

Phone No: 011-42181244, Email ID: genesis599@gmail.com, Website: [www.genesisfinance.net](http://www.genesisfinance.net)

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30<sup>th</sup> May, 2022

To,

**The Listing and Compliance Head,  
Metropolitan Stock Exchange of India Limited**

Building A, Unit 205A, 2nd Floor,  
Piramal Agastya Corporate Park,  
L.B.S Road, Kurla West, Mumbai – 400070

**SYMBOL: GENESISFIN  
ISIN: INE421K01019**

**Subject:** Submission of Annual Secretarial Compliance report for the financial year ended on 31<sup>st</sup> March, 2022.

Dear Sir/Ma'am,

With reference to the captioned subject and pursuant to the provisions of Regulation 24A of SEBI Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Clause 3(b)(iii) of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the company for the year ended 31<sup>st</sup> March, 2022 issued by **Mr. Abhimanyu Upadhyaya** proprietor of **M/s. A. Upadhyaya & Associate**.

Kindly take the same in your record.

For and on behalf of  
**Genesis Finance Company Limited**



**Gopal Bisht**  
**(Whole Time Director & Chief Financial Officer)**

**DIN:** 00597160

**Office Address:** 4 MMTC/STC Market,  
Geetanjali, New Delhi -110017

**Date:** 30<sup>th</sup> May, 2022

**Place:** New Delhi

**Encl.:** as above



**A. UPADHYAYA & ASSOCIATES**  
COMPANY SECRETARY

Mob. : 9312271115  
011-45769176

Add. : 6/41, 209, Sunder Kiran Building, W.E.A., Karol Bagh, New Delhi-110005  
E-mail : [updacs@yahoo.co.in](mailto:updacs@yahoo.co.in), [updacs@gmail.com](mailto:updacs@gmail.com)

Ref. No.

Date : .....

**Secretarial Compliance Report of Genesis Finance Company Limited  
For the year ended March 31, 2022**

I, **Abhimanyu Upadhyaya**, a Practicing Company Secretary of **M/s. A. Upadhyaya & Associates**, holding **Certificate of Practice No.: 4729 and Membership No.: F 5921** having registered office at 6/41 Sunder Kiran Building, 209 WEA Karol Bagh, New Delhi-110005 have examined:

- a) all the documents and records made available to us and explanation provided by **Genesis Finance Company 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 31<sup>st</sup> March, 2022 ("**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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of capital and disclosure requirements) Regulations, 2018: **Not Applicable**
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**



- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**
- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

**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  |
|---------|---|---|---|
| 1.      | Pursuant to Regulation 23(9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; The listed entity shall submit within 30 days* from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis, in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the | The Company has submitted the disclosures of related party transactions for the half-year ended i.e., October- March, 2021 on <b>31<sup>st</sup> July, 2021</b> .<br><br>Since, the Company was obliged to submit the same on or before <b>30<sup>th</sup> July, 2021</b> , it had made a delay of 1 day in filing the required disclosure. The company was able to submit the prescribed | The Metropolitan Stock Exchange of India Limited on which the equity shares of the Company are listed, had levied a fine of INR 5,000 /- (Rupees Five Thousand Only) <i>plus applicable GST</i> and directed the Company to pay the fine within 15 days from the date of order letter dated August 20, 2021.<br><br>The Company has paid the fine to the stock exchange within the provided time. |



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|--|---|--|
| <p>same on its website.</p> <p><i>*Note: The above provision has been amended w.e.f. 01<sup>st</sup> April, 2022 through (Listing Obligations and Disclosure Requirements) (Sixth Amendment) Regulations, 2021.</i></p> <p><i>The amended provision mandates entities to make such disclosure every six months within 15 days from the date of publication of its standalone and consolidated financial results.</i></p> | <p>disclosure on<br/><b>31<sup>st</sup> July, 2021.</b></p> |  |
|--|---|--|

- 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) No actions taken against the promoters/ directors/ of the listed entity 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 except the following actions taken against the listed entity by the stock exchange:

| 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.                  |
|---------|--|--|--|---|
| 1.      | Metropolitan Stock Exchange of India Limited | Delay in compliance of Reg. 23 (9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended June, 2021. | The Metropolitan Stock Exchange of India Limited has levied a fine of INR 5,000 /- (Rupees Five Thousand Only) plus applicable GST and directed the Company to pay the fine within 15 days from the date | The Company has paid the said fine to the stock exchange within the aforesaid time. |



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|--|--|--|-------------------------------------|--|
|  |  |  | of letter dated<br>August 20, 2021. |  |
|--|--|--|-------------------------------------|--|

d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**

| Sr. No. | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|--|--|
| NIL     | NIL  | NIL   | NIL  | NIL  |

**For A. Upadhyaya & Associates  
Company Secretaries**



**Abhimanyu Upadhyaya  
(Practicing Company Secretaries)**

**M. No.:F5921**

**C.P. No.:4729**

**UDIN: F005921D000390021**

**Date: 25/05/2022**

**Place: Delhi**