adventz

Date: 30th May, 2025

The Listing Department
The Calcutta Stock Exchange Limited
7, Lyons Range
Kolkata - 700 001

Dear Sir,

Sub: Secretarial Compliance Report for the financial year ended 31st March, 2025 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Enclosed herewith please find the Secretarial Compliance Report for the financial year ended 31st March, 2025 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This is for your information and record.

Thanking you,
Yours faithfully

For **Adventz Securities Enterprises Limited**

Punam Singh

Company Secretary
Mem No. A38649

NAME : PUNAM SINGH
MEMBERSHIP NO.
(ICSI) - A38649
ADD. - 4, N. G. BASAK ROAD,
DUM DUM, KOLKATA-700080

Encl: As above

Cc: The Listing Department
MSEI Limited
205(A), 2nd Floor,
Piramal Agastya Corporate Park
Kamani Junction, LBS Road
Kurla (West)
Mumbai - 400070

ADVENTZ SECURITIES ENTERPRISES LIMITED
Hongkong House, 31 B. B. D. Bagh (South), Kolkata - 700 001, Tel.: +91-33-2248 8891/92
Fax: +91-33- 2243 7215 Email: corp@poddarheritage.com
CIN : L36993WB1995PLC069510

ROHIT KUMAR
ACS, ACMA, LLB, M.Com
Practising Company Secretary

Basundhara Apartment
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27, Italgacha Road, Kolkata - 700 079
Mob. : 9178839826, 7008131226
E-mail : rohitkumarbar@yahoo.co.in

Secretarial Compliance Report of Adventz Securities Enterprises Limited *for the financial year ended 31.03.2025*

I, Rohit Kumar , Practicing Company Secretary, have examined :

(a) all the documents and records made available to me and explanation provided by ***Adventz Securities Enterprises 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 31.03.2025 ("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, 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018 : Not Applicable to the Company during the year under report;

(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 to the Company during the year under report;

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(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 : Not Applicable to the Company during the year under report;

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 : Not Applicable to the Company during the year under report;

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

(h) other regulations : none

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 :

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1	SEBI Circular	SEBI Circular No. SEBI/ HO/ MIRSD/ MIRSD_RTAMB/ P/CIR/2022/70 dated May 25, 2022	Non – Compliance with the provisions of the Circular	-	-	Non – Compliance with the provisions of the Circular	-	The Company has not yet taken Special Contingency Insurance Policy	The Company is in process of taking the Special Contingency Insurance Policy	-
2	SEBI Circular	SEBI Circular No. SEBI/ HO/ MIRSD/ PoD-1/ OW/ P/ 2022/64923 dated 30.12.2022	Non – Compliance with the provisions of the Circular	-	-	Non – Compliance with the provisions of the Circular	-	The Company has not yet opened Suspense Escrow Demat Account	The Company is in the process of opening the Suspense Escrow Demat Account	-

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

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Sl. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the Secretarial compliance report for the year ended ……… (the years are to be mentioned)	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.	Delay in Submission of Outcome of Board Meeting held on 11.08.2023 for approval of Financial results for the quarter ended 30th June, 2023 at Metropolitan Stock Exchange	31.03.2024	Regulations 33 of SEBI (LODR) Regulations, 2015	There was a delay in submission of outcome for the Board Meeting held on 11.08.2023 for approval of financial results for the quarter ended 30th June, 2023 at Metropolitan stock exchange	The delay was due to technical issues in the portal of MSEI	-
2	The Company has not yet taken Special Contingency Insurance Policy	31.03.2024	SEBI Circular No. SEBI/ HO/ MIRSD/ MIRSD_RTAMB/ P/CIR/2022/70 dated May 25, 2022	The Company has not yet taken Special Contingency Insurance Policy	The Company is in process of taking the Special Contingency Insurance Policy	-
3	The Company has not yet opened Suspense Escrow Demat Account	31.03.2024	SEBI Circular No. SEBI/ HO/ MIRSD/ PoD-1/ 0W/ P/ 2022/64923 dated 30.12.2022	The Company has not yet opened Suspense Escrow Demat Account	The Company is in the process of opening the Suspense Escrow Demat Account	-

I. I hereby report, 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

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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 of India (ICSI).	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 entity. • 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 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 Yes Yes	
4.	**Disqualification of Director :** None of the Director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	

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5.	**Details related to Subsidiaries of listed entity have been examined w.r.t. :** (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	N.A. N.A.	The Company had no subsidiary during the financial year under report
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	
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	

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8.	**Related Party Transactions :**		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.	Yes	
	(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.	N.A.	No such case was reported during the financial year under report.
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) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	

Rohit Kumar
Kolkata

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11.	**Actions taken by SEBI or Stock Exchanges, *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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** 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.	N.A.	No such case was reported during the financial year under report.

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13.	**Additional Non-compliances, *if any* :** No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	

I further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the SEBI LODR Regulations – Not Applicable

Assumptions & Limitation of Scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

Rohit Kumar

Rohit Kumar Kolkata Practising Company Secretary

Signature:

Place : Kolkata
Dated :30.05.2025

Name of the Practicing Company Secretary : CS Rohit Kumar
ACS No. : 54039
CP No. : 26603
UIN : 12023WB2459400
UDIN : A054039G000503884