



# SCINTILLA COMMERCIAL & CREDIT LTD.

"Mercantile Building", Block - E, 2nd Floor, 9/12, Lal Bazar Street, Kolkata - 700001  
Ph.: 2248 5664, E-mail : info@scintilla.co.in, Website : www.scintilla.co.in  
CIN : L65191WB1990PLC048276,

Date: 21/06/2021

To,  
The Secretary,  
Listing Department  
BSE Limited,  
P.J. Towers, Dalal Street,  
Mumbai - 400 001

To,  
The Secretary,  
Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata-700001

**Scrip Code: 538857**

**Sub: Submission of Annual Secretarial Compliance Report for the Year Ended March 31, 2021**

Dear Sir/Madam,

Pursuant to the Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 please find enclosed herewith the Annual Secretarial Compliance Report of Scintilla Commercial & Credit Ltd for the year ended March 31, 2021 as issued by Mr. Rajesh Ghorawat, Practicing Company Secretary.

This is for your information and record.

Thanking you,

Yours faithfully,  
**For Scintilla Commercial & Credit Ltd**

*Surbhi Rajgadia*

**Surbhi Rajgadia**  
**Company Secretary & Compliance Officer**

Encl: As above

# RAJESH GHORAWAT

**PRACTISING COMPANY SECRETARY**

68, R. K. CHATTERJEE ROAD,  
KASBA BAKULTALA, 3<sup>RD</sup>FLOOR,  
KOLKATA-700042  
MOBILE- 9836029000  
Email [Id-rgadvisory18@gmail.com](mailto:Id-rgadvisory18@gmail.com)

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Secretarial Compliance Report of **SCINTILLA COMMERCIAL & CREDIT LTD**  
for the year ended March 31, 2021

To,  
**Scintilla Commercial & Credit Ltd**  
"Merchantile Building", Block – E,  
2<sup>nd</sup> Floor, 9/12, Lal Bazar Street,  
Kolkata – 700001, West Bengal

I, Rajesh Ghorawat, Practicing Company Secretary have examined:

- a) all the documents and records made available to us and explanation provided by **Scintilla Commercial & Credit Ltd** ("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 March 31, 2021 ("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, **to the extent of Acts/ Provisions of the Acts applicable to the company** 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 review period)*

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- 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 review period)*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not Applicable to the Company during the review period)*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not Applicable to the Company 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 to the Company during the review period)*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulation, 1993 and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Non-Compliance of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for the Half Year ended September, 2020	Delay in compliance of one (1) day of the said regulation. BSE via mail as per SEBI circular no. SEBI/HO/CFD/CMD/C	The Company served a letter to BSE via mail dated 28-01-2021 seeking waiver of the fine and the matter is still under consideration

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		IR/P/2020/12 dated January 22, 2020 imposed fine on the company.	/ pending with BSE Limited.
2.	Non-compliance of Regulation 13(3), 27(2) and 31 of SEBI (LODR), 2015 for the quarter ended 31 <sup>st</sup> March, 2020.	The Company has complied with the said regulation after the revised due-date i.e. May 15, 2020, delay caused due to the nationwide lockdown in order to stop the spread of COVID-19 Pandemic.	The Company wrote letter to BSE Limited with a request to waive off the fine levied on the company due to Non-Compliance of Regulations and with regular follow up, the BSE Limited has waived off the fine levied on the company in respect of the Regulation 13(3), 27(2) and 31 vide its mail dated 15/04/2021, 23/12/2020 & 29/09/2020 respectively.

- 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 our 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g., Fines, Warning Letter, Debarment, etc.	Observations/ Remarks of the Practising Company Secretary, if Any.
	BSE	Delay in Submission of Related Party Transactions pursuant to the Regulation 23(9) of SEBI (LODR)	Fines as per SEBI circular no. SEBI/HO/CFD/CMD/ CIR/P/2020/12 dated January 22, 2020	The Company had requested to BSE to waive off the fines imposed on the Company vide its letter dated 27 <sup>th</sup> January, 2021 for delay in filing of Related

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		Regulations, 2015 for the Half Year ended September 30, 2020		Party Transactions on consolidated basis pursuant to Regulation 23(9) of SEBI (LODR) Regulations, 2015 for the half year ended September 30, 2020. Further, reply from BSE Limited is yet to be received.
2.	BSE	Delay in Submission of Investor Complaint pursuant to Regulation 13(3), 31 & 27(2) of SEBI (LODR) Regulations, 2015 for the quarter ended March 31, 2020	Fines as per SEBI circular no. SEBI/HO/CFD/CMD/C IR/P/2020/12 dated January 22, 2020 and SEBI/HO/CFD/CMD/C IR/P/2018/77 dated May 3, 2018	The Company had requested BSE to take lenient view in this matter and to waive off the fines levied on the Company during the COVID – 19 - Global Pandemic & Nationwide Lockdown. Further, the BSE Limited has waived off the fine levied on the Company vide its mail dated 15/04/2021, 23/12/2020 & 29/09/2020 respectively.

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 Secretary in the Previous Reports	Observation made in the Secretarial Compliance report for the year ended	Actions taken by the Listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	Few Uploads were not in machine readable format	2020	Company took necessary actions in this regard.	NIL

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**PRACTISING COMPANY SECRETARY**

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2.	RTA SEBI registration number in XBRL filing was not mentioned. Company was required to rectify & mention correct RTA SEBI registration number in XBRL.	2020	Company took necessary steps and filed the revised XBRL mentioning RTA registration number on 22 <sup>nd</sup> July, 2019.	NIL
3.	There was mismatch of Reporting Data of PDF file while comparing with XBRL filing. The company was required to rectify mismatch details.  Point No 22: Compliance Officer: mentioned in PDF and in XBRL was mismatched.	2020	Company took necessary steps and further filed the revised report on 25 <sup>th</sup> January, 2020.	NIL
4.	Non-Submission of Financial Results for the Quarter Ended June, 2019	2020	The Company has filed the Financial Result for the quarter ended June, 2019 vide its letter dated 10.09.2019.  As per the SEBI Circular CIR/CFD/FAC/62/2016 dated 05.07.2016 during the first year of implementation of IND-AS, the timeline for submission of	NIL

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			financial result was September, 14.	
5.	XBRL filing of Financial Result was not as per NBFC (Division III) Format. The company was required to submit revised XBRL filing of Result in proper format.	2020	Company has filed the revised report in XBRL Format on 14 <sup>th</sup> November, 2019.	NIL



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

UDIN: F007226C000491281

Date: 21/06/2021  
Place: Kolkata