Phone : 033 4061 2288, 9331116100 E-mail : paragoncal@gmail.com

Website: www.paragonfinanceltd.com

Dated: 30th May, 2022

To,
The Secretary
Corporate Relationship Department
BSE Limited
Phiroze Jeejebhoy Towers
Dalal Street, Fort
Mumbai - 400001

Dear Sir/Madam,

Ref: Security Code: 531255

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8 February 2019, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31 March 2022 duly issued by a Practicing Company Secretary.

This is for your information and records.

Thanking you.

Yours Faithfully,

FOR PARAGON FINANCE LIMITED

SANJAY KUMAR GUPTA Company Secretary



A L & ASSOCIATES

Company Secretaries

24, Netaji Subhas Road, 4th Floor, Room No. 33, Kolkata - 700 001 Ph.: 4007 4750, E-mail: alassociates2014@gmail.com

<u>Secretarial Compliance Report of Paragon Finance Limited</u> <u>for the year ended 31st March, 2022</u>

I Priti Lakhotia, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Paragon Finance Limited.
- (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 31st March, 2022 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued there under 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;
- 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008;
- g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares)Regulations,2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/guidelines issued there under;



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 to the extent applicable.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations, circulars and guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) No actions are 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 aforesaid Acts/ Regulations &circulars/ guidelines issued thereunder.

There were no observations in the report for the previous year and therefore no actions were desired to be taken by the listed entity

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PRITI LAKHOTIA

FOR AL & ASSOCIATES

Practicing Company Secretary

Membership No: 10843 C.P. No.: 12790

UDIN: F010843D000438481

Place: Kolkata Date: 30/05/2022