



NITESH CHAUDHARY & ASSOCIATES
PRACTICING COMPANY SECRETARY

SECRETARIAL COMPLIANCE REPORT OF PRISMX GLOBAL VENTURES LIMITED
For the year ended on 31st March, 2021
(Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
PRISMX GLOBAL VENTURES LIMITED
412, Hubtown Solaris, Sai Wadi,
N S Phadke Marg, Andheri East
Mumbai MH 400069 IN

I Nitesh Chaudhary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Prismx Global Ventures Limited. ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other documents/ filings, which were relevant, and relied upon to make this certification and issue this report,

For the year ended 31st March, 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, include:-

- i) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (not applicable for the year under review);
- v) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (not applicable for the year under review).
- vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (not applicable for the year under review);
- vii) 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);
- viii) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- ix) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- x) Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) Regulations, 2018;

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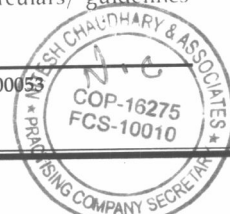
And based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the Covid-19 pandemic, I hereby report that, during the review period:

- (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.	Compliances under Regulation 29(2)/29(3) for the Quarter ended September 2020	Delay - Submission of Intimation under Regulation 29(2)	<p>The management of the Company has informed that they have given a shorter notice for Board Meeting for approval of Un-audited Financial results for the Quarter ended 30th September, 2020, as due to Covid-19 Pandemics and health issues of the Company Secretary the delay of 2 days was happened.</p> <p>The company has also informed that the company has submitted the clarifications and waiver application with the reasons of delay and situation of Covid -19 pandemics therefore the company was late in filing under Regulation 29(2) and company has also informed that SEBI has also given relaxation for Regulation 29(2) vide its circular in the month of April 2020 till the period 31st July 2020 due to Covid-19 pandemics, companies management waiting for reply of clarification & waiver application filed by company.</p>
2	Non-compliance under Reg. 6(1) with requirement to appoint a qualified company secretary as the compliance officer	Appointment of Company Secretary as Compliance officer	<p>The Company has informed that the previous Company Secretary & Compliance Office was resigned from 13/11/2019 and company should have appoint new CS on or Before 13th May 2020, however there was a State Lockdown in Maharashtra from 19/03/2020 and nationwide lockdown from 25/03/2020 therefore the procedure of appointment could not be completed within stipulated time due to Covid -19 pandemics.</p> <p>The Companies management has informed the appointment of CS cum Compliance officer was done on 17th July, 2020.</p> <p>The Company also filed the clarification, waiver application with stock exchange which was accepted and approved by stock exchange, the penalty imposed by Exchange waived off for Regulation 6(1) of SEBI (LODR) Regulations 2015, which was accepted and waiver granted by BSE vide its email dated 16/04/2021.</p>

- (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) 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:

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Sr. No.	Action taken by	Details of Non-Compliance	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE	Non-compliance under Regulation 29(2)/29(3) read with Regulation 30, Notice of Board Meeting for approval of Un-Audited financial results for the Quarter Ended 30 th September, 2020	Penalty levied of Rs. 11,800 including GST imposed by BSE Ltd. on the Company.	The Company has informed that clarification and waiver application has been submitted to BSE Ltd. stating the facts of current situation of Country and specially Mumbai where the situation is still not regularized due to Covid-19, and requested for waive of penalty, reply of the clarification cum waiver application is awaited.
2	BSE	Non-compliance under Reg. 6(1) with requirement to appoint a qualified company secretary as the compliance officer	Penalty levied of Rs. 80,000 plus GST was imposed by BSE Ltd. on the Company.	The Company has submitted its clarification and waiver application with BSE Ltd. for waiver of penalty as company could not comply the requirements of Regulation 6(1) of SEBI LODR Regulations 2015 and the BSE Ltd. has approved the waiver of penalties vide its email dated 16/04/2021.

For Nitesh Chaudhary & Associates
Practicing Company Secretary



Nitesh Chaudhary
Nitesh Chaudhary
C.P. No.: 16275
Membership FCS - 10010

UDIN: F010010C000518760

Place: Mumbai
Date: 25/06/2021