

# CMX HOLDINGS LIMITED

(Earlier Known as SIEL FINANCIAL SERVICES LIMITED)

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May 29, 2023

To,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai,  
Maharashtra 400 001.

Scrip Code: 532217

**Subject: Submission of Annual Secretarial Compliance Report for the Year ended 31st March, 2023**

Dear Sir,

In Compliance with the Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith a copy of Annual Secretarial Compliance Report for the year ended 31st March, 2023 issued by M/s. Amit R. Dadheech & Associates, Practicing Company Secretaries.

Thanking You,

For CMX Holdings Limited  
(Formerly known as SIEL FINANCIAL SERVICES LIMITED)



**Parmeet Singh Sood**  
Managing Director  
DIN-00322864

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**REGD OFFICE:- SONI MANSION, 12-B, RATLAM KOTHI, INDORE-452 001  
(M.P.)**

**CIN : L74110MP1990PLC007674**

**(PREVIOUS CIN : L65999MP1990PLC007674)**

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**SECRETARIAL COMPLIANCE REPORT**  
**OF**  
**CMX HOLDINGS LIMITED**  
**(FORMERLY KNOWN AS SIEL FINANCIAL SERVICES LIMITED)**

**FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023**

To,  
CMX Holdings Limited,  
4th Floor, Soni Mansion,  
12-B Ratlam Kothi,  
Indore - 110125 (Madhya Pradesh)

We, M/s. Amit R. Dadheech & Associates, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by **CMX Holdings 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 March 31, 2023 \*("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 financial year under review)*
- 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 financial year under review)*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not Applicable to the Company during the financial year under review)*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not Applicable to the Company during the financial year under review)*
- 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 financial year under review)*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



and circulars/ guidelines issued thereunder; and based on the above examination, 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	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	NIL
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/ guidelines issued by SEBI</li></ul>	Yes	NIL
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate section on the website</li><li>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</li></ul>	Yes	NIL
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL



5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Not Applicable	NA
6.	<u>Preservation of Documents:</u> 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	NIL
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	NIL
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (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.	Yes	NIL
9.	<u>Disclosure of events or information:</u> 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	NIL
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NIL
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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	Yes	<b>Imposition of Penalty by BSE Limited due to Non-Compliance of Regulation 27(2) &amp; Regulation 23(9) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 for the Quarter Ended September 2022.</b>



			In response to the said mail, the Company has filed a waiver application with BSE Limited, the same is still under review.
12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/ guidance note etc.	NO	NA

b) 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)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 23 (9) disclosure of related party transactions on consolidated	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 23, 2015	Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	BSE Limited	FINE LEVIED	Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	194700	FINE HAS BEEN PAID	Compliance has been done and fine has been paid	Compliance has been done and fine has been paid
2	Corporate Governance Report under Regulation 27 of SEBI LODR.	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 27, 2015	Regulation 27(2) Non submission of the Corporate governance compliance report within the period provided under this	BSE Limited	FINE LEVIED	Regulation 27(2) Non submission of the Corporate governance compliance report within the period provided under	151040	FINE HAS BEEN PAID	Compliance has been done and fine has been paid	Compliance has been done and fine has been paid



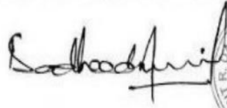

*Amit R. Dadheech & Associates*  
Company Secretaries

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c) The listed entity has taken the following actions to comply with the observations made in previous reports: NO

Sr.No	Compliance Requirement (Regulations / circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

For Amit R. Dadheech & Associates

Amit R. Dadheech  
ACS No. 22889, COP No. 8952

Date: May 27, 2023

Place: Mumbai

UDIN: A022889E000398748