HOLDINGS LIMITED

CMX HOLDINGS LIMITED
(Formerly known as SIEL FINANCIAL SERVICES LIMITED)

CIN : L74110MP1990PLC007674
(PREVIOUS CIN : L65999MP1990PLC007674)

May 29, 2025

To,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai, Maharashtra 400001

Scrip Code: 532217

Subject: Annual Secretarial Compliance Report for the year ended March 31, 2025, under Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements), 2015 read with SEBI circular No. IR/CFD/CMD1/27/2019 dated February 08, 2019.

Dear Sir/ Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation & Disclosure Requirements), 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019; we are enclosing herewith the Annual Secretarial Compliance Report for the year ended March 31, 2025, issued by M/s. Shivam Sharma & Associates, Mumbai.

Kindly take this on your records and acknowledge the same.

Thanking You,

For CMX HOLDINGS LIMITED
(Formerly known as SIEL FINANCIAL SERVICES LIMITED)

AVEEN KAUR SOOD
DIN: 02638453
(Managing Director)

Encl: A/A

Regd. Office:
Soni Mansion, 12-B, Ratlam Kothi, Indore - 452 001 (M.P.) INDIA

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SECRETARIAL COMPLIANCE REPORT OF CMX HOLDINGS LIMITED FOR THE YEAR ENDED 31ST MARCH, 2025.

To,
CMX Holdings Limited (Formerly known as SIEL Financial Services Limited),
Add: 4th Floor, Soni Mansion,
12-B Ratlam Kothi, Indore - 452001 MP.

I Shivam Sharma have examined:

- all the documents and records made available to us and explanation provided by **CMX Holdings Limited** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2025 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the audit period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the review period)**

- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **(Not applicable to the Company during the review period)**

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:

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**	**Remark**
1.	The listed entity shall submit audited standalone financial results for the quarter, within 45 days from the end of the financial year along with the audit report in prescribed format.	33 of SEBI (LODR) 2015.	--	BSE	Imposed Fine	The Company has not filed result in prescribed timeline for quarter and year ended 31.03.2024.	Rs. 1,23,900 /-	The Company has been filed result after prescribed timeline with the fine levied by the BSE for Rs. 1,23,900/-.	The Company has been complied the provisions with the fine levied by the BSE for Rs. 1,23,900/-.	--
2.	Regulation 23(9) with respect to submission of disclosure of	Regulation 23(9) of SEBI	--	--	--	The Company is not Complied	--	The Company inadvertently	The Company inadver	--

	Related party transaction	(LODR) Regulations, 2015				the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for quarter and half year ended 30.09.2024.		missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for quarter and half year ended 30.09.2024. However, the Company has been filed on 14.12.2024	tently missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for quarter and half year ended 30.09.2024. However, the Company has been filed on 14.12.2024	
3.	The listed entity shall submit unaudited financial results for the quarter, within 45 days from the end of the quarter along with the limited review report in prescribed format.	30(6) and 33 of SEBI (LODR) 2015.	--	--	--	The Company has not filed result in prescribed timeline for quarter and half year ended 30.09.202	--	The Company has been filed result after prescribed timeline on 13.12.2024.	The company delayed in the submission of its unaudited financial results due to the	--

						4.			completion of the tenure of the previous Statutory Auditor. The appointment of a new Statutory Auditor was delayed, which in turn impacted the timely finalization of the financial statements. As a result, the unaudited financial results for the relevant period could not be submitted within	

									the prescribed time line.	
4.	As per regulation 34 of LODR the listed entity shall submit to the stock exchange and publish on its website- (a) a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders; and As per Regulation 36 the listed entity shall send annual report, to the holders of securities, not less than twenty-one days before the Annual General Meeting.	Regulation 34 and 36	--	--	--	The Company has not submitted Annual Report and Notice of AGM before the 21 days of AGM.	--	The Company has submitted Annual Report and Notice of AGM after the 21 days of AGM.	The company has experienced a delay in the submission of the Notice of the Annual General Meeting and the Annual Report due to the unavailability of certain members of the Board of Directors. Their absence impacted the timely finalization and approv	--

Address:- 304, 3rd Floor, Ghanshyam Enclave, Near Lalji Pada Police Station, Kandivali West Mumbai 400067.
Mo. No.:- 9769892542, Email ID: Csshivam02@gmail.com

									al process required for dispatching these documents. Consequently, the company was unable to circulate the Notice and Annual Report within the prescribed time frame.	
5.	As per regulation 44 the listed entity shall submit to the stock exchange, within two working days of conclusion of its General Meeting, details regarding the voting results in the format specified by the Board.	Regulation 44 of LODR	--	--	--	The Company has submitted voting result of Extra-Ordinary General Meeting held on 04.12.2024 after the 2 working days.	--	The Company has submit voting result of Extra-Ordinary General Meeting held on 04.12.2024 after the 2 working days.	The company delayed in the submission of the voting results of the Extra-Ordinary General Meeting (EGM)	--

									due to a technical error. The Registrar and Share Transfer Agent (RTA) inadvertently entered incorrect credentials for the Scrutinizer, which prevented the Scrutinizer from downloading the e-voting data within the stipulated timeline. As a result, the compilation and submission of	

									the voting results were delayed beyond the prescribed period.	

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

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	Remark
1.	The listed entity shall submit audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report.	33 of SEBI (LODR) 2015.	The Company has not filed result in prescribed manner for quarter and year ended 31.03. 2023	BSE	Imposed Fine	The Company has not filed result in prescribed manner for quarter and year ended 31.03.2023.	Rs. 82,600/-	The Company has been complied the provisions with the fine levied by the BSE for Rs.82,600/-.	The Company has been complied the provisions with the fine levied by the BSE for Rs.82,600/-.	--
2.	The listed entity shall submit audited	33 of SEBI (LODR)	The Company has	BSE	Imposed Fine	The Company has not	Rs. 5,900/-	The Company has	The Company has	-

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Mo. No.:- 9769892542, Email ID: Csshivam02@gmail.com

	standalone financial results for the quarter, within 45 days from the end of the financial year along with the audit report in prescribed format.	2015.	not filed result in prescribed manner for quarter ended 30.09.2023.			filed result in prescribed manner for quarter ended 30.09.2023.		been complied the provisions with the fine levied by the BSE for Rs.5,900/-.	been complied the provisions with the fine levied by the BSE for Rs.5,900/-.	

I. I hereby report that, 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*
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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Except in certain cases
2	**<u>Adoption and timely updation of the Policies:</u>** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time	Yes	None

	as per the regulations /circulars/ guidelines issued by SEBI.		
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	None
4	**Disqualification of Director:** None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	None
5	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** • Identification of material subsidiary companies • Requirements with respect to disclosure of material as well as other subsidiaries.	NA	The Company does not have any subsidiary.
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	None
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 as prescribed in SEBI Regulations.	Yes	None
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 NA	None Prior approval of Audit Committee was obtained for all the Related Party Transactions.
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	None
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	None
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	Yes, except observations as mentioned in the remark column.	Details in above mentioned in the Point no. "A".

	thereunder.		
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.	NA	However, the Company has appointed M/s S. K. Mehta & Co., Chartered Accountants (FRN: 000478N) as the Statutory Auditor of the Company after the completion of 5 years term of M/s S. S. Kothari Mehta & Company.
13	**Additional Non-compliances, if any:** No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	NA	No additional non-compliance was observed except Details in above mentioned in the Point no. “A”.

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 certify based upon our 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.

5 This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to financial year ended March 31, 2025.

6 The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on random test basis.

7. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.

Thanking You
For Shivam Sharma & Associates
Company Secretaries

SHIVAM SHARMA

Digitally signed by SHIVAM SHARMA
Date: 2025.05.29 17:37:00 +05'30'

Shivam Sharma
(Proprietor)
M. No.: A35727, CP. No.: 16558
Peer Review Certificate No.: 1811/2022
UDIN: A035727G000493657
Place: Mumbai
Date: 29.05.2025