

# UNITED CREDIT LIMITED

UCL/ 54 /2023-24

May 27, 2023

The Manager – Corporate Services  
BSE Limited  
Floor 25, P. J. Towers  
Dalal Street  
Mumbai – 400 001  
**SCRIP CODE NO. 531091**

The Calcutta Stock Exchange Limited  
7, Lyons Range  
Kolkata – 700001  
**SCRIP CODE NO. 10031023**  
Attn.: Ms. Chandrani Datta

Dear Sir / Madam,

## **SUBJECT: ANNUAL SECRETARIAL COMPLIANCE REPORT**

We enclosed in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Secretarial Compliance Report of the Company from Mr. Sumantra Sinha, Practising Company Secretary, for the financial year ended, 31<sup>st</sup> March, 2023.

Please take the same on record.

Thanking you,

Yours faithfully,  
For UNITED CREDIT LIMITED

DEEPALI  Digitally signed by  
DEEPALI GUPTA  
Date: 2023.05.27  
11:28:39 +05'30'  
(Deepali Gupta)  
Company Secretary & Compliance Officer

Encl: as above.



## UNITED CREDIT GROUP

REGISTERED OFFICE : 27-B, CAMAC STREET (8TH FLOOR), KOLKATA - 700 016

PHONE : +91-33-2287-9359, 2287-9360, 2287-9185, FAX : +91-33-2287-2047

CIN : L65993WB1970PLC027781

E-mail : unitedcreditltd@gmail.com, Website : www.unitedcreditltd.com



**SECRETARIAL COMPLIANCE REPORT**  
**of UNITED CREDIT LIMITED**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2023**

I, CS Sumantra Sinha, Practising Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **UNITED CREDIT LIMITED CIN: L65993WB1970PLC027781** ("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 **31<sup>st</sup> March, 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;
- (f) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

During the period under review, provisions of the following regulations/guidelines/standards **were not applicable to the Company**:

- (a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

I hereby report that during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1	<b>Secretarial Standards:</b> 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	Yes	



	notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.		
2	<b>Adoption and timely updation of the Policies:</b> 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, as per the regulations/circulars/guidelines issued by SEBI	Yes	
3	<b>Maintenance and disclosures on Website:</b> 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	
4	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA	The Company does not have any subsidiary
6	<b>Preservation of Documents:</b> 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	
7	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes  NA	No such case
9	<b>Disclosure of events or information:</b> 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	Yes	





	limits prescribed thereunder.		
10	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been 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 except as provided under separate paragraph herein (**).	Yes	
12	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: **The Statutory auditors were re-appointed in the AGM held on 27.09.2022 for a period of 5 years and continues to hold such office.**

*\*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

(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:

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observation s / Remarks of the Practising Company Secretary	Management Response	Remarks
1	Submission of financial results for the Quarter ended 31.12.2022	Regulation 33	Delay in Submission of financial results mentioned	BSE Ltd.	Freezing of Promoter's trading account  Fine	As per email dt. 31.03.2023, BSE Ltd., informed the promoter that the Company has not paid fines imposed for the period mentioned towards such delay as observed by them	Rs. 11,800 (including GST)	The fine imposed w.r.t the said regulation was paid by the company on 04.05.2023 and BSE unfroze the Promoter's trading account on 10.05.2023	The Company had made a waiver application dt. 08.05.2023 stating inter-alia that it has duly observed all requirements as per the said regulation within stipulated time, which remains pending	No further consequential action has been taken against the Company till date





(b) The listed entity has taken the following actions to comply with the observations made in previous reports:  
**Secretarial Compliance Report was not applicable to the Company in the previous year(s).**

Sl. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken By	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount (Rs.)	Observations / Remarks of the Practising Company Secretary	Management Response	Remarks
-	-	-	-	-	-	-	-	-	-	-

**(Note:**

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.
  2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations.
- E.g. In the report for the year ended 31st March, 2023, the PCS shall provide a list of:
- all the observations in the report for the year ended 31st March, 2022 along with the actions taken by the listed entity on those observations.
  - the observations in the reports pertaining to the year ended 31st March, 2022 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.)

**SUMAN** Digitally signed  
 by SUMANTRA  
 TRA SINHA  
 Date: 2023.05.26  
 12:41:08 +05'30'

(CS Sumantra Sinha)  
 Practising Company Secretary  
 ACS 11247/CP No.:15245  
 PR: 1421/2021

UDIN: A011247E000383951

Place: Kolkata  
 Date: 26<sup>th</sup> May, 2023



**CERTIFIED TRUE COPY**

For UNITED CREDIT LIMITED

*[Handwritten Signature]*  
 Company Secretary