



**Secretarial Compliance Report of Geojit Financial Services Limited
for the financial year ended 31.03.2023**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Geojit Financial Services Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 11th Floor, 34/659-P, Civil Line Road, Padivattom, Kochi – 682024. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31.03.2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

- a. all the documents and records made available to us and explanation provided by Geojit Financial Services 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 report,

for the financial year ended 31.03.2023 ("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 (Buyback of Securities) Regulations, 2018; (Not applicable during the year under review.)
- e. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during the year under review.)
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable during the year under review.)
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020
- j. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- k. Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018
- l. Securities and Exchange Board of India (Research Analysts) Regulations, 2014
- m. Securities and Exchange Board of India (Investment Advisers) Regulations, 2013
- n. Securities and Exchange Board of India {KYC (Know Your Client) Registration Agency} Regulations, 2011
- o. Securities and Exchange Board of India (Intermediaries) Regulations, 2008
- p. Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations 2007.
- q. Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair trade practices relating to securities Market) Regulations 2003
- r. Securities and Exchange Board of India (Stock Brokers) Regulations, 1992
- s. And other regulations as applicable and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

- I. 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: **Attached as Annexure A**



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	Remarks
					Advisory/ Clarification / Fine/Show Cause Notice/ Warning, etc.					
1	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Reg 21 (3C)	There was an inadvertent delay in holding the second meeting of Enterprise Risk Management Committee as required under regulation 21 of SEBI (LODR) Regulation 2015.	Nil	Nil	Nil	Nil	There was no delay in holding the meeting during the period under review.	Meeting was subsequently held on 23 rd March 2023. There was no delay in holding of meetings during the year under review	Nil

II. 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: **NA**

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	The auditor of the listed entity or its material subsidiary have

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
	<p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>		not resigned during the year under review.
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p>	NA	No such event during the review period



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
	<p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	The listed entity/its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	The auditor of the listed entity or its material subsidiary have not resigned during the year under review.

III. We 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.	<p>Secretarial Standards:</p> <p>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.</p>	Yes	
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> 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	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> 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.	Disqualification of Director: 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.	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ol style="list-style-type: none"> Identification of material subsidiary companies Disclosure requirement of material as well as other subsidiaries 	Yes	
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	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.	Yes	
8.	Related Party Transactions: <ol style="list-style-type: none"> The listed entity has obtained prior approval of Audit Committee for all related party transactions; or 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	Please refer point no. 8(a)
9.	Disclosure of events or information: The listed entity has provided all the required applicable disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 (**).	No	Details of Action taken against the listed entity by SEBI or by Stock Exchanges is given as Annexure A to the Report
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	There was delay in complying with the requirement under Regulation 17(1C) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 to obtain shareholders' approval for the appointment of the Nominee Director to the Board of Directors.



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. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We 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
5. (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.

Place: Kochi

Date: 30.05.2023

For Satheesh and Remesh, Company Secretaries

**For Satheesh and Remesh
Company Secretaries**

N. Satheesh Kumar
Partner
N. Satheesh Kumar 16543
Partner **CP No. 6607**
ACS.16543.
CP.No:6607

UDIN number A016543E000421420





Annexure -A										Annexure A
Letter date	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Reference	Action Taken by	Deviation	Details of violation	Type of action	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response
1	30-01-2023	Circular	Circular NSE/INSP/45191 dated July 31, 2020 NSE/INSP/46960 dated January 8, 2021	13372_GEOJIT_ACT_2 1-22_NF_CMFOCDS_TR DG_15519 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during January 2022 NSE/INSP/MCSGFC-83/CMFOCDS/OFFSITE/21-22/ACT/13372	NSE	Yes	a. Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collection to the exchange in the case of 88 instances involving a shortfall of Rs. 40.90 Lakhs as on December 09, 2021, and December 17, 2021.	No Action	0	
							b. Passing of penalty to clients on account of short/non-collection of upfront margins Observation The penalty charged by the clearing corporation on account of reporting	Warning	0	
							c. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation Geojit did not report the early pay-in value to the Exchange in the case of 1 instance involving Rs.3,744 as on December 09, 2021	Warning	0	
2	12-01-2023	Circular	NSE/INSP/13606, dated December 3, 2009 NSE/INSP/33276, dated September 27, 2016,	13372_GEOJIT_ACT_2 1-22_NF_CMFOCDS_TR DG_16998 Limited Purpose Inspection (Offsite) in	NSE	Yes	Non-settlement of clients' funds Observation Geojit did not settle the client's funds in the case of 09 instances,	Advice	0	



3	27-01-2023	Circular	NSE/INSP/33276 dated September 27, 2016	13372_GEOJIT_ACT_2 1- 22_NF_CM_TRDG_17 202 Limited Purpose Inspection (Offsite) in CM segments conducted during November 2021 NSE/INSP/MCSGFC- 83/CM/OFFSITE/21- 22/ACT/13372	NSE	Yes	Incorrect data submitted towards the weekly monitoring of client funds Observation Discrepancies were observed in the cash and cash equivalent submission and weekly enhanced supervision submission while reconciliation of the client balances	Warning	0		
4	30-01-2023	Circular	NSE/INSP/43926, dated March 23, 2020. NSE/INSP/46960 dated January 8, 2021.	13372_GEOJIT_ACT_2 1- 22_NF_CMFOCDS_TR DG_18089 NSE/INSP/MCSGFC- 83/CMFOCDS/OFFSITE/21-22/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during April 2022	NSE	Yes	a. Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collection to the exchange in the case of 18 instances involving a shortfall of Rs. 8.13 Lakhs for a period between February 25, 2022, February 28, 2022, March 11, 2022, and March 17, 2022	No Action	0		
							b. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation Geojit reported incorrect PAN as part of cash and cash equivalent submission to the Exchange in a case of 1 instance as on February 25, 2022	Warning	0		



5	10-02-2023	Circular	NSE/INSP/46960 dated January 8, 2021 NSE/INSP/43926 dated March 23, 2020 NSE/INSP/46960 dated January 8, 2021	13372_GEOJIT_ACT_2 1- 22_F_CMFOCDs_TRD G_13539 NSE/INSP/MCSGFC-83/CMFOCDs/OFFSITE/21-22/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during December 2021	NSE	Yes	a. Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collection to the exchange in the case of 09 instances involving a margin shortfall of Rs.65.25 Lakhs as on September 08, 2021 and September 17, 2021.	No Action	0		
							b. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation Geojit had the following discrepancies while reporting the client level cash and cash equivalent submission to the Exchange as on September 08, 2021, and September 17, 2021: i. Incorrect reporting of the peak ledger balance in case of 21 instances involving Rs.4.48 crores. ii. Incorrect reporting of the value of early pay-in and the peak ledger balance in the case of 5 instances involving Rs.72.19 lakhs and Rs.24.63 lakhs iii. Incorrect reporting of the ledger balance, peak ledger balance and value of early pay-in, in	Penalty	100000		Request submitted to Exchange for review



6	10-02-2023	Circular	NSE/INSP/42919 dated December 16, 2019.	13372_GEOJIT_ACT_2 2- 23_F_CMFOCDs_TRD G_26568 NSE/INSP- ENF/CMFOCDs/OFFSI TE/22-23/ACT-2022- 22079/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD segment conducted during November	NSE	Yes	Observation HSB reported an incorrect margin collected from the client in one instance, for (UCC DNH027) involving Rs.1.18 Lakhs as on October 21, 2022	Penalty	5900		
7	21-02-2023	Circular	NSE/INSP/42919 dated December 16, 2019	13372_GEOJIT_ACT_2 2- 23_F_CMFOCDs_TRD G_25808 NSE/INSP- ENF/CMFOCDs/OFFSI TE/22-23/ACT-2022- 21319/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD segments conducted during October 2022	NSE	Yes	Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collected from the client in 1 instance (UCC: JZK133), involving Rs.0.03 lakh, as on October 07,2022	Penalty	100		
8	21-02-2023	Circular	NSE/INSP/42919 dated December 16, 2019	13372_GEOJIT_ACT_2 2- 23_F_CMFOCDs_TRD G_26722 NSE/INSP- ENF/CMFOCDs/OFFSI TE/22-23/ACT-2022- 22233/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD segments conducted during November	NSE	Yes	Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collected from the client in the case of 1 instance (UCC: HKJ141), involving Rs.0.49 lakh, as on October 28,2022	Penalty	2400		
9	03-03-2023	Circular	NSE/INSP/38154, dated June 27, 2018	13372_GEOJIT_ACT_2 1- 22_F_CMFOCDs_TRD G_13775 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during December 2021. NSE/INSP/MCSGFC- 87/CMFOCDs/OFFSI TE/21-22/ACT/13372	NSE	Yes	i. Incorrect reporting of margin collected from clients Observation Geojit reported incorrect margin collection to the exchange in the case of 10 instances involving a shortfall of Rs.0.53 Crores as on September 24, 2021 and September 29, 2021	Warning	0		



					NSE	Yes	<p>ii. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances.</p> <p>Observation Geojit had following discrepancies while reporting the cash and cash equivalent submission to the Exchange as on September 24, 2021, and September 29, 2021:</p> <p>i. Incorrect reporting of the peak ledger balance to the Exchange in case of 18 instances involving Rs.3.72 crore</p> <p>ii. Incorrect peak ledger balance to the Exchange and value of the Early Pay-in in the case of 8 instances involving Rs.1.09 crore</p>	Penalty	100000		Request submitted to Exchange for review
10	13-03-2023	Circular	<p>NSE/INSP/43926, dated March 23, 2020</p> <p>NSE/INSP/46960 dated January 8, 2021</p>	<p>13372_GEOJIT_ACT_2</p> <p>1-22_NF_CMFOCDs_TR DG_19034</p> <p>NSE/INSP/MCSGFC-88/CMFOCDs/OFFSITE/21-22/ACT/13372</p> <p>Limited Purpose Inspection (OFFSITE) in CM, F&O and CD Segments conducted during May 2022</p>	NSE	Yes	<p><u>Non-settlement of clients' funds and securities</u></p> <p>Observation Geojit did not settle the client funds in the case of 28 instances involving Rs.1.34 crores as on March 31, 2022</p>	Advice	0		

13

10



11	17-03-2023	Circular	NSE/INSP/48624 dated June 16, 2021	13372_GEOJIT_ACT_2 1- 22_NF_CMFOCOM_T RDG_20434 NSE/INSP/MCSGFC- 88/CMFOCOM/OFFSITE/21-22/ACT/13372 Limited Purpose Inspection (OFFSITE) in CM, F&O and COM Segments conducted during June 2022	NSE	Yes	<u>Non-settlement of clients' funds and securities</u> <u>Observation</u> Geojit did not settled the client accounts in the respective quarter as on February 04, 2022, February 11, 2022, and February 25, 2022, in the case of 03 instances involving Rs.8.63 Lakhs	Advice	0		
12	20-03-2023	Circular	NSE/INSP/43926, dated March 23, 2020 NSE/INSP/46960 dated January 8, 2021	13372_GEOJIT_ACT_2 2- 23_F_CMFOCDs_TRD G_26070 NSE/INSP- ENF/CMFOCDs/OFFSITE/22-23/ACT-2022- 21581/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during November 2022	NSE	Yes	<u>Incorrect data submitted towards weekly client-level Holding Statement, cash and cash equivalent and bank account balances.</u> <u>Observation</u> Geojit not reported the Cash and Cash Equivalent balances in case of 1 instance during the period July 30, 2022, to September 25, 2022.	Penalty	100000		Request submitted to Exchange for review
13	17-03-2023	Circular	NSE/INSP/13606 dated December 3, 2009 NSE/INSP/33276, dated September 27, 2016	13372_GEOJIT_ACT_2 2- 23_NF_CMFOCDs_TRD DG_21013 NSE/INSP/MCSGFC- 88/CMFOCDs/OFFSITE/22-23/ACT/13372 Limited Purpose Inspection (OFFSITE) in CM, F&O and CD Segments conducted	NSE	Yes	<u>Non-settlement of clients' funds and securities</u> <u>Observation</u> Geojit failed to settle the client funds who haven't traded in the last 30 days as on May 31, 2022, in 10 instances amounting to Rs 8.10	Advice	0		



				during June 2022	NSE	Yes	<u>Incorrect data submitted towards Client level Cash & Cash Equivalent and Bank account Balances</u> Observation Geojit not reported the financial ledger balance (clear) B in cash and cash equivalent submission to the Exchange in the case of 19 instances involving as on May 1, 2022.	Warning	0		
14	31-03-2023	Circular	NSE/INSP/43926, dated March 23, 2020 NSE/INSP/46960 dated January 8, 2021	13372_GEOJIT_ACT_2-23_F_CMFOCDs_TRD G_22908 NSE/INSP/MCSGFC-89/CMFOCDs/OFFSIT E/22-23/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during July 2022	NSE	Yes	<u>Incorrect reporting of margin collected from clients</u> Observation Geojit reported incorrect margin collection to the exchange in the case of 05 instances involving a shortfall of Rs.2.21 Lakhs as on July 22, 2022.	Penalty	5800		
15	31-03-2023	Circular	NSE/INSP/13606 dated December 3, 2009 NSE/INSP/33276, dated September 27, 2016	13372_GEOJIT_ACT_2-23_F_CMFOCDs_TRD G_23660 NSE/INSP/MCSGFC-89/CMFOCDs/OFFSIT E/22-23/ACT-2022-19171/13372 Limited Purpose Inspection in CM, F&O and CD Segments conducted during August 2022	NSE	Yes	<u>Incorrect reporting of margin collected from clients</u> Observation Geojit reported incorrect margin collected from the client in 7 instances, involving Rs.0.79 Lakh as on July 29, 2022.	Penalty	2900		



16	31-03-2023	Circular	NSE/INSP/48624 dated June 16, 2021	13372_GEOJIT_ACT_2 2- 23_NF_CMFOCDs_TR DG_23280 NSE/INSP/MCSGFC- 89/CMFOCDs/OFFSITE E/22-23/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during April 2022	NSE	Yes	Non-settlement of client funds and securities Observation Geojit did not settled the client funds in the case of 03 instances, involving Rs.1.08 Crore.	Advice	0		
17	31-03-2023	Circular	NSE/INSP/38154, dated June 27, 2018 NSE/INSP/45191, July 31, 2020	13372_GEOJIT_ACT_2 2- 23_NF_CMFOCDs_TR DG_23338 NSE/INSP/MCSGFC-89 /CMFOCDs/OFFSITE/2 2-23/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD segments conducted during August 2022	NSE	Yes	Non-settlement of client funds and securities Observation Geojit did not settled the client funds in the case of 30 instances, involving Rs.1.07 Crore as as on 30-09-2022	Advice	0		
							Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation Geojit failed to report the cash and cash equivalent file to the Exchange, in case of 04 instances as on various dates between May 2022 to June 2022	No Action	0		
18	31-03-2023	Circular	NSE/INSP/48624 dated June 16, 2021	13372_GEOJIT_ACT_2 2- 23_NF_CMFOCDs_TR DG_25416 NSE/INSP/MCSGFC- 89/CMFOCDs/OFFSITE E/22-23/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during October 2022	NSE	Yes	Non-settlement of clients' funds Observation Geojit did not settle the client funds who have not traded in the last 30 days in case of 25 instances involving Rs 0.12 crores as on August 30, 2022.	Advice	0		

19	07-09-2022	Circular	NSE/INSP/38154, dated June 27, 2018 NSE/COMP/4853 dated June 09, 2021 NSE/INSP/10367 dated February 28, 2008, NSE/INSP/38154 dated June 27, 2018, and NSE/INSP/43069 dated December 31, 2019	Limited Purpose Inspection in CM, F&O and CD Segments conducted during September 2021 NSE/INSP/MCSGFC-57/CMFOCDs/OFFSIT E/21-22/ACT/13372	NSE	Yes	LO-1 1. Geojit incorrectly reported peak ledger balance in case of 12 out of 40 instances selected for sample scrutiny, involving Rs. 1.74 crores 2. Geojit incorrectly reported the margin in case on 19 out of 40 instances amounting to Rs. 0.48 crores selected for sample scrutiny. LO-2 1. Peak ledger balance under-reported to the Exchange in case of 30 out of 60 instances involving Rs. 3.79 Crores 2. Clear ledger balance not reported to the Exchange in case of 5 out of 60 instances involving Rs. 26.28 Lakhs 3. Incorrect reporting of margin collected from clients, in case of 16 out of 60 instances, involving	Penalty	100000		Request submitted to Exchange for review
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20	29-09-2022	Circular	NSE/INSP/46960 dated January 08, 2021	Limited Purpose Inspection (Offsite) in CM, F&O, and CD Segments conducted during November 2021 NSE/INSP/MCSGFC-63/CMFOCDs/OFFSIT E/21-22/ACT/13372	NSE	Yes	a. Incorrect data submitted towards client level cash and cash equivalent balances and bank account balances. Observation Geojit submitted incorrect data towards client level cash and cash equivalent balances in 2 areas as of July 23, 2021, and July 30, 2021, as under: Peak financial ledger balance in 18 out of 40 instances amounting to Rs.0.34 crore MTF ledger balance in 2 out of 40 instances amounting to Rs.0.09 crore b. Incorrect reporting of margin collected from clients Observation Geojit incorrectly reported margin collected from clients in	Warning	0		
21	29-09-2022	Circular	NSE/INSP/39393 dated November 13, 2018	Limited Purpose Inspection in CM Segment conducted during October 2021 NSE/INSP/MCSGFC-74/CM/LPI/21-22/ACT/13372	NSE	Yes	Incorrect data uploaded in the weekly holding statement Observations Geojit had uploaded incorrect data towards weekly submission of holding statement in 1,186 instances amounting to Rs. 1,767.30 Crores as of March 19, 2021, March 22, 2021, and April 19, 2021	Penalty	100000		Request submitted to Exchange for review



22	20-09-2022	Circular	NSE/INSP/13606 dated December 3, 2009	Limited Purpose Inspection in CM, F&O and CD Segments conducted during January 2022 NSE/INSP/MCSGFC-69/CMFOCDs/OFFSIT E/21-22/ACT/13372	NSE	Yes	Non-settlement of clients' funds and securities Observation Geojit failed to settle the clients' funds and securities in 18 out of 100 instances selected for sample scrutiny (18% of the total sample instances) involving Rs.0.49 crores as of September 30, 2021.	Warning	0		
23	20-09-2022	Circular	NSE/INSP/13606 dated December 3, 2009	Limited Purpose Inspection in CM, F&O and CD Segments conducted during January 2022 NSE/INSP/MCSGFC-69/CMFOCDs/OFFSIT E/21-22/ACT/13372	NSE	Yes	Non-settlement of clients' funds and securities Observation Geojit failed to settle the clients' funds and securities in 5 out of 106 instances selected for sample scrutiny (4.72% of the total sample instances) involving Rs.0.08 crores as of October 29, 2021.	Warning	0		
24	20-09-2022	Circular	NSE/INSP/13606 dated December 3, 2009	Limited Purpose Inspection in CM, F&O and CD Segments conducted during January 2022 NSE/INSP/MCSGFC-69/CMFOCDs/OFFSIT E/21-22/ACT/13372	NSE	Yes	Non-settlement of clients' funds and securities Observation Geojit failed to settle the clients' funds and securities in 2 out of 100 instances selected for sample instances (2% of the total sample instances) involving Rs.0.02 crores as of November 30, 2021	Warning	0		

25	11-11-2022	Circular	NSE/INSP/45191 dated July 31, 2020	Limited Purpose Inspection (Offsite) in CM, F&O, and CD Segments conducted during February 2022 NSE/INSP/MCSGFC-77/CMFOCDs/OFFSIT E/21-22/ACT/13372 13372_GEOJIT_ACT_2 1- 22_NF_CMFOCDs_TR DG_15922	NSE	Yes	Incorrect reporting of margin collected from clients Geojit has reported incorrect margin collected from the clients to Exchange, in the case of 52 instances involving a shortfall of Rs.0.15 Crores as on December 24, 2021, and December 31, 2021 Member has passed penalty to clients on account of short/non-collection of upfront margins Geojit has passed on short/non-collection of upfront margins to the client in the case of 08 instances, as on December 24, 2021, and December 31, 2021.	Warning	0		
26	04-11-2022	Circular	NSE/INSP/38154, dated June 27, 2018	13372_GEOJIT_ACT_2 2- 23_NF_CMFOCDs_TR DG_18908 NSE/INSP/MCSGFC-77/CMFOCDs/OFFSIT E/21-22/ACT/13372 Offsite Inspection in CM, F&O and CD Segments conducted during February 2022	NSE	Yes	Incorrect reporting of margin collected from clients GEOJIT reported incorrect margin collected from the client to the exchange, in the case of 2 instances (Client Code - QUR071 and ACXR039) involving Rs.0.50 Lakh as on April 06, 2022	Warning	0		





27	08-12-2022	Circular	NSE/INSP/43926, dated March 23, 2020 NSE/INSP/46960 dated January 8, 2021	Limited Purpose Inspection (Offsite) in CM, F&O, and CD Segments conducted during November 2021 NSE/INSP/MCSGFC-82/CMFOCDs/OFFSIT E/21-22/ACT/13372 13372_GEOJIT_ACT_2 1-22_F_CMFOCDs_TRD G_12667.	NSE	Yes	<u>Incorrect data uploaded towards weekly client level cash and cash equivalent and bank account balances.</u> Geogit has reported incorrect data towards weekly submission of cash and cash equivalent balances to the Exchange in case of 18 instances involving Rs. 2.77 Crores as on July 09, 2021, and July 16, 2021	Penalty	100000		Request submitted to Exchange for review
28	09-12-2022	Circular	NSE/INSP/43926, dated March 23, 2020 NSE/INSP/50592 dated December 13, 2021	Offsite Inspection in CM, F&O, and CD Segments conducted during December 2021 NSE/INSP/MCSGFC-77/CMFOCDs/OFFSIT E/21-22/ACT/13372 13372_GEOJIT_ACT_2 1-22_F_CMFOCDs_TRD G_13918	NSE	Yes	<u>Incorrect data reported towards Client level Cash & Cash Equivalent Balances and Bank Account Balances</u> <u>Observation</u> <u>LO-1</u> GEOJIT has reported incorrect data towards client level cash and cash equivalent balances and bank balances as on October 08, 2021, and October 13, 2021, as under: Incorrect peak financial ledger balance (clear) reported to the Exchange in the case of 21 instances involving Rs.3.73 crores Incorrect client PAN reported to the exchange in the case of 1 instance <u>LO-2</u> GEOJIT has reported incorrect data towards	Penalty	100000		Request submitted to Exchange for review

2



29	08-12-2022	Circular	NSE/INSP/33276, dated September 27, 2016	Offsite Inspection in CM, F&O and CD Segments conducted during January 2022 NSE/INSP/MCSGFC-82/CMFOCD/OFFSIT E/21-22/ACT/13372 13372_GEOJIT_ACT_2 1- 22_NF_CMFOCD/ TR DG_15753	NSE	Yes	Non-Settlement of client funds & Securities Observation Geogit did not settle the client funds and securities in case of 17 instances involving Rs 0.36 crores as on December 31, 2021	Advice	0	
30	01-12-2022	Circular	NSE/INSP/43926, dated March 23, 2020 NSE/INSP/46960 dated January 8, 2021	13372_GEOJIT_ACT_2 1- 22_F_CMFOCD/ TRD G_18293 NSE/INSP/MCSGFC-80/CMFOCD/OFFSIT E/21-22/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during April 2022 13372_GEOJIT_ACT_2 1- 22_F_CMFOCD/ TRD G_18293	NSE	Yes	a. Incorrect reporting of margin collected from clients Observation Geogit has incorrectly reported the margin collected from the clients to the Exchange in the case of 2 instances (UCC ACXJ001 and YGK116) involving Rs.7,951.36 as on March 25, 2022. b. Incorrect data uploaded toward weekly client-level cash and cash equivalent and bank account balances. Observation Geogit has reported incorrect financial ledger balance (clear) "B" while reporting cash and cash equivalent balances to the Exchange in the case of 93 instances involving Rs.2.83	Penalty	100000	Request submitted to Exchange for review

22



31	01-12-2022	Circular	As per Regulation 6.1.5 of the Regulations (F&O segment) and Regulation 6.1.4 of Part A of the Capital Market Regulations of the Exchange	13372_GEOJIT_ACT_2 1-22_NF_CMFOCDS_TR DG_16819 NSE/INSP/MCSGFC-80/CMFOCDS/OFFSIT E/21-22/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during February 2022	NSE	Yes	a. Incorrect data submitted towards weekly client-level cash and cash equivalent and bank account balances. Observation – LO1 Geogit has reported incorrect data towards weekly submission of cash and cash equivalent ledger balances (clear) "B" to the Exchange in the case of 1 instance involving Rs.0.01 crores as on February 04, 2022 b. Incorrect reporting of margin collected from clients Observation Geogit incorrectly reported the margin collected from the clients to the Exchange as under; LO-1 In the case of 39 instances involving Rs.0.14 crores as on	Warning	0		
32	16-12-2022	Circular	NSE/INSP/13606 dated December 3, 2009 NSE/INSP/33276, dated September 27, 2016	13372_GEOJIT_ACT_2 1-22_NF_CMFOCDS_TR DG_15346 NSE/INSP/MCSGFC-82/CMFOCDS/OFFSIT E/21-22/ACT/13372 Limited Purpose Inspection (Offsite) in CM, F&O and CD Segments conducted during February 2022	NSE	Yes	Non-Settlement of client funds Observation Geogit did not settle the client funds in case of 06 instances involving Rs 0.14 crores as on November 18, 2021, and November 26, 2021.	Advice	0		
33	30-05-2022	Circular	20211029-41 dated 29 Oct 2021	Penalty for violations observed in Internal Audit Report for half year ended September 2021	BSE	Yes	1. Client registration documentation /Anti Money Laundering compliance 1(z) Member has not uploaded the KYC data with CKYCR in respect of all existing individual accounts (i.e. accounts	Penalty	6000		Penalty debited by exchange

34	12-05-2022	Circular	NSE/INSP/48048 dated April 20, 2021	Penalty for violations observed in Internal Audit Report for half year ended March 21	NSE	Yes	1. Client registration documentation / Anti Money Laundering compliance 1(z) Member has not uploaded the KYC data	Penalty	3000		Penalty debited by exchange
35	16-05-2022	Circular	NSE/INSP/50110 October 26, 2021	Penalty for violations observed in Internal Audit Report for half year ended September 21			1. Client registration documentation / Anti Money Laundering compliance 1(z) Member has not uploaded the KYC data with CKYCR in respect of all existing individual accounts (i.e. accounts	Penalty	5000		Penalty debited by exchange
36	-	SEBI (Listing Obligations and Disclosure Requirements), 2015	Reg 17 (1C)	Approval of shareholders were not taken within a time period of three months from the date of appointment of Nominee Director on 05.08.2022	-	Yes	Approval of shareholders were not taken within a time period of three months from the date of appointment of Nominee of Kerala State Industrial Development Corporation Ltd (A Government of Kerala undertaking) in the Board of the Company on 05.08.2022.	-	-	The Management informed that the Company is the process of obtaining shareholder's approval	The Company intends to obtain approval of shareholders in its upcoming Annual General Meeting

