



Paragon Finance Limited

CIN-L65921WB1986PLC040980

SIKKIM HOUSE, 4/1 Middleton Street, Kolkata-700 071

Phone: 033 4061 2288,

E- compliancesdesk@gmail.co

Website: www.paragonfinance.in

15th May, 2026

To,
The Department of Corporate Services
BSE Limited
Ground Floor, P. J. Tower,
Dalal Street, Mumbai-400001

Scrip Code: 531255

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2026

Dear Sir/Ma'am,

Pursuant to the Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report issued by **Altab Uddin Kazi (C.P No.: 27662, Membership No.: F12581)**, Practicing Company Secretary, Howrah for the financial year ended March 31, 2026.

Please take the same on your record and oblige.

Thanking you.

Yours faithfully,

For Paragon Finance Limited

Sanjay Kumar Gupta
Whole Time Director & Company Secretary
DIN: 00213467

(Encl. as above)



SECRETARIAL COMPLIANCE REPORT

Paragon Finance Limited

(CIN: L65921WB1986PLC040980)

Sikkim House 4th Floor 4/1 Middleton Street, Kolkata, West Bengal, India, 700071

for the year ended 31st March, 2026 [Reg 24(A), SEBI LODR REG, 2015]

I, Altab Uddin Kazi, Proprietor of M/s. **Altab Kazi & Associates (Firm Regn. No.: S2024WB999500) (P.R No. 6249/2024)**, Company Secretaries, having office at 53/B, Kazi Para Lane, Shibpur, West Bengal, Howrah – 711102, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s **Paragon Finance Limited (CIN: L65921WB1986PLC040980)** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity which is <https://www.paragonfinance.in/>
- (d) all other document / filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2026 (“Review Period”), in respect of compliance with the provisions of:
 - (i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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 as there is no instance of Buyback during the year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there is no instance of Share Based Employee Benefits during the year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) All other regulations as may be applicable 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 Takenby	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
N/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
N/A										



ADDITIONAL DISCLOSURES

On the basis of **SEBI Notice No: 20230316-14 dated: 16th March, 2023**, the following additional affirmations included are as follows:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS*
1.	<u>Secretarial Standard</u> The compliances of listed entities are in accordance with the Applicable Secretarial Standard (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	Nil
2.	<u>Adoption and timely updation of the Policies:</u> <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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	Nil Nil
3.	<u>Maintenance and disclosures on Website:</u> <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 • Yes • Yes	Nil Nil 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	The company don't have any subsidiary/material subsidiary
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	Yes NA	Nil



	transactions were subsequently approved/ ratified/ rejected by the Audit committee		
9.	Disclosure of events or information: 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.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Nil
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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	Nil
12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Not Applicable	Nil

**All the observation in the previous report was compiled by the company during that period which was also mentioned in the previous report. Hence no reporting required.*

OR

**Previous Report did not contain any observation in Annexure-A and hence, reporting of the same is NIL*



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 certify 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. Wherever required, we have obtained the Management representation/ reports/ certificates of technical subject experts about the compliance of laws, rules and regulations, happening of events, etc. and relied upon.
5. Maintenance of secretarial records is the responsibility of the management of the Company. My Responsibility is to express an opinion on these secretarial records, based on my inspection of records produced before us for Audit.
6. 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.

For ALTAB KAZI & ASSOCIATES

Company Secretaries

Firm Regn. No.: S2024WB999500

Altab Uddin Kazi



CS Altab Uddin Kazi

(Proprietor)

FCS No. **12581**

C.P. No: **27662**

Peer Review Regn No. 6249/2024

UDIN: F012581H000371786

Howrah, May 15, 2026