

May 25, 2021

To,
Department of Listing Operations
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

Trading Symbol: **SECMARK**
Scrip Code: **543234**

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read along with CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mr. Keyur Ghelani, Proprietor of K. P. Ghelani & Associates, Practicing Company Secretaries for the financial year 2020-21.

This is for the information of the exchange and the members.

Thanking you

Yours faithfully,

For SecMark Consultancy Limited

**Sunil Kumar
Bang** Digitally signed by
Sunil Kumar Bang
Date: 2021.05.25
15:52:33 +05'30'

Sunil Kumar Bang
Company Secretary & Compliance Officer

Encl: As above



**SECRETARIAL COMPLIANCE REPORT
OF**

**SECMARK CONSULTANCY LIMITED
FOR THE YEAR ENDED MARCH 31, 2021**

I, Keyur Ghelani, Proprietor of K. P. Ghelani & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by SECMARK CONSULTANCY 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, 2021 ("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 to the Company during the Review Period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the Review Period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during the Review Period**
- (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 Review Period**.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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)	Deviations	Observations / Remarks of the Practising Company Secretary
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations / Remarks of the Practising Company Secretary, if any
NIL				



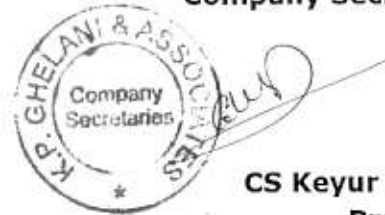


- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practising Company Secretary in previous reports	Observations made in the Secretarial compliance report for the year ended-	Action taken by listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
NIL				

For K. P. Ghelani & Associates
Company Secretaries

Date: May 25, 2021
Place: Rajkot



CS Keyur Ghelani
Proprietor
Mem. No. 33400
C.P. No. 12468
UDIN: A033400C000367712