

Date: November 12, 2021

To,
The Manager,
The Department of Corporate Services,
BSE Limited,
P.J. Tower, Dalal Street,
Mumbai – 400 001.
Scrip Code: 543234

Dear Sir/Madam,

Sub: Nil Statement on Deviation(s) or Variation(s) under Regulation 32(1) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 (“Listing Regulations”).

Pursuant to the provisions of Regulation 32 of the Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/162/2019 dated December 24, 2019 regarding “Format on statement of Deviation or Variation for proceeds of public issue, rights issue, preferential issue, Qualified Institutions Placement (QIP) etc.”, we hereby confirm that there is no deviation in the use of proceeds from the objects stated in the prospectus dated September 09, 2020 issued for the Initial Public Offering of equity shares of the Company. A Nil Statement of Deviation, duly reviewed by the Audit Committee of the Company in their meeting held on November 12, 2021 is given in “Annexure-A”.

The proceeds raised by the Company through the Initial Public Offering of equity shares of the Company, during the half year ended September 30, 2021, have been utilized for the objects as stated in prospectus dated September 09, 2020.

You are requested to disseminate the above information on your website.

This intimation is also being uploaded on the Company's website at www.secmark.in

Thanking you,

For **SecMark Consultancy Limited**

Sunil Kumar Bang
Company Secretary

Place: Mumbai

Enclosure: Annexure A

	Statement of Deviation / Variation in utilisation of funds raised					
	Name of listed entity – SecMark Consultancy Limited					
Mode of Fund Raising	Public Issues / Rights Issues / Preferential Issues / QIP / Others					
	Date of Raising Funds – September 29, 2020					
	Amount Raised - Rs.1503.90Lakhs					
	Report filed for Quarter/Halfyear ended – September 30, 2021					
Monitoring Agency	Not applicable					
Monitoring Agency Name, if applicable	– Not Applicable					
Is there a Deviation / Variation in use of funds raised	No					
	If yes, whether the same is pursuant to change in terms of a contract or objects, which was approved by the shareholders- Not Applicable					
	If Yes, Date of shareholder Approval – Not Applicable					
	Explanation for the Deviation / Variation – Not Applicable					
	Comments of the Audit Committee after review – Funds are utilized for the objects as stated in prospectus dated September 09, 2020 and there is no deviation					
	Comments of the auditors, if any – Nil					
	Objects for which funds have been raised and where there has been a deviation, in the following table					
Original Object	Modified Object, if any	Original Allocation	Modified allocation, if any	Funds utilised	Amount of Deviation/Variation for the quarter according to applicable object	Remarks if any
To finance development and/or procurement of technology, applications, software, infrastructure etc. including strategic acquisitions of Firms/Companies in the technology space to complement and enhance our Company's value proposition.	No Modification	Rs. 460.00 Lakhs	Not Applicable	Rs.460.00 Lakhs	No Deviation	Not Applicable
To expand and retain our Leadership team that will lead the Company into the next phase of growth	No Modification	Rs. 300.00 Lakhs	316.51 Lakh *	Rs.120.96 Lakhs	No Deviation	See Note Below
To acquire / rent assets	No Modification	Rs. 150.00 Lakhs	Not Applicable	Rs. 150.00 Lakhs	No Deviation	Not Applicable
Repayment of bank facilities	No Modification	Rs. 150.00 Lakhs	Not Applicable	Rs.150.00 Lakhs	No Deviation	Not Applicable
General corporate purposes	No Modification	Rs. 339.90 Lakhs	Not Applicable	Rs. 339.90 Lakhs	No Deviation	Not Applicable
	Deviation or variation could mean:					
	(a) Deviation in the objects or purposes for which the funds have been raised or					
	(b) Deviation in the amount of funds actually utilized as against what was originally disclosed or					
	(c) Change in terms of a contract referred to in the fund raising document i.e. prospectus, letter of offer, etc					
Sunil Kumar Bang Digitally signed by Sunil Kumar Bang Date: 2021.11.12 19:06:16 +05'30'	* Note: The total issue expenses for public issue was estimated for Rs. 104.00 Lakh. As mentioned in the prospectus for IPO, if the actual expenses incurred is less than the estimated, the balance will be utilised against object -“ To expand and retain our Leadership team that will lead the Company into the next phase of growth”. Actual expenses incurred in this regard were Rs. 87.49 Lakh. Hence the balance amount of Rs. 16.51 Lakh has been added to Rs. 300 Lakh of original allocation to “To expand and retain our Leadership team that will lead the Company into the next phase of growth”. Thus the modified allocation has come to Rs. 316.51 Lakh.					
Name of Signatory – Sunil Kumar Bang						
Designation – Company Secretary						