

May 30, 2024

To
Deputy General Manager (Listing)
Department of Corporate Services
BSE Ltd.,
Phiroze Jeejeebhoy Towers
25th Floor, Dalal Street
Mumbai - 400001
Scrip Code: 531169

Sub: Submission of Annual Secretarial Compliance Report of SKP Securities Limited ("the Company") for Financial Year ended March 31, 2024.

Dear Sir,

In accordance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we herewith submit the Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2024, issued by M/s A. Murarka & Co., Practicing Company Secretaries.

We request you to kindly take the same on record.

Thanking You,

Yours Sincerely,

For SKP Securities Limited

Alka
Khetawat
Alka Khetawat
Company Secretary
Membership No: A47322



Encl: as above

SECRETARIAL COMPLIANCE REPORT OF SKP SECURITIES LIMITED

FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2024

SKP SECURITIES LIMITED

CIN: L74140WB1990PLC049032

BioWonder, Level 17

789, Anandapur, EM Bypass

Kolkata 700107

We, A Murarka & Co, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **"SKP Securities Limited"** ("the listed entity");
- (b) the filings/ submissions made by the listed entity to the Stock Exchange;
- (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 31st March, 2024 ("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 (including amendments, modifications from time to time), 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



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- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018: **Not Applicable to the Company during the Review Period;**
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: **Not Applicable to the Company during the Review Period;**
- (f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021: **Not Applicable to the Company during the Review Period;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021: **Not Applicable to the Company during the Review Period;**
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021: **Not Applicable to the Company during the Review Period;**
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and dealing with client: **Not Applicable to the Company during the Review Period;**
- (j) Securities and Exchange Board of India (Stock Brokers) Regulations, 1992;
- (k) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (l) Securities and Exchange Board of India (Research Analysts) Regulations, 2014;
- (m) Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007;
- (n) Securities and Exchange Board of India (Prohibition of Fraudulent & Unfair Trade Practices relating to Securities Market) Regulations, 2003;
- (o) Securities and Exchange Board of India (Mutual Funds) Regulations, 1996;
- (p) Securities and Exchange Board of India (Portfolio Managers) Regulations 2020;
- (q) Securities and Exchange Board of India (Merchant Bankers) Regulations 1992;



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and based on the above examination. We 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 Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2023	Compliances Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation/ deviations and actions taken/penalty, imposed, if any, on the listed entity.	Remedial actions, if any, taken by the listed entity.	Comments of the PCS on the actions taken by the listed entity.
NIL						

- I. We hereby report that, during the Review Period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries 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 entity; • 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 Yes	Nil Nil





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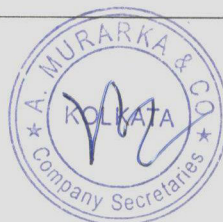
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website; • Timely dissemination of the documents/ information under a separate section 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. 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Nil</p> <p>Nil</p> <p>Nil</p>
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Listed entity.</p>	<p>Yes</p>	<p>Nil</p>
5.	<p><u>Details related to Subsidiaries of listed entity have been examined w.r.t. :</u></p> <p>a) Identification of material subsidiary companies;</p> <p>b) Disclosure requirement of material as well as other subsidiaries.</p>	<p>a) N.A.</p> <p>b) N.A.</p>	<p>a) The Company does not have any subsidiary.</p> <p>b) Please refer Point no. a) above</p>
6.	<p><u>Preservation of Documents:</u></p> <p>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.</p>	<p>Yes</p>	<p>Nil</p>
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.</p>	<p>Yes</p>	<p>Nil</p>

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
8.	<p><u>Related Party Transactions:</u></p> <p>a) The listed entity has obtained prior approval of Audit Committee for all Related Party transactions; or</p> <p>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.</p>	<p>a) Yes</p> <p>b) N.A.</p>	<p>a) Nil</p> <p>b) Since Audit Committee approval were there for all the Related Party Transaction, no observations is made.</p>
9.	<p><u>Disclosure of events or information:</u></p> <p>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.</p>	Yes	Nil
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	Nil
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No action(s) has been taken against the listed entity/ its Promoters/ Directors/ Subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.</p>	Yes	Nil
12.	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has/have complied with paragraph 6.1 and 6.2 section V-D of chapter V of the Mater Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	N.A.	Nil



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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Nil

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

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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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: Kolkata

Date: 29th May, 2024



For A MURARKA & CO
Company Secretaries
FRN: S1992WB10700

(ANIL KUMAR MURARKA)
FCS No.: 3150
CoP No.: 1857
PR No.: 2199/2022
UDIN: F003150F000467746