

May 29, 2023

To,  
Dept. of Corporate Services (CRD)  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

**Scrip Code: 540192**

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report for Financial Year 2022-23**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the financial year 2022-23.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,  
For **LKP Securities Limited**

**Akshata Vengurlekar**  
**Company Secretary**  
**A 50701**

Encl.: As above

**LKP Securities Ltd.**

Regd Off: 203 Embassy Centre, Nariman Point, Mumbai – 400021, Phone: 022 – 2282 8234, Fax 022 – 2284 2415  
Head Off: 2nd floor, Gala Impecca, Andheri Kurla Road, Nr. Hotel Courtyard Marriott, Chakala, Andheri (E), Mumbai – 400059  
Tel.: +91 22 6635 1234 . Fax: +91 22 6635 1249 . Website: [www.lkpsec.com](http://www.lkpsec.com)  
Single SEBI registration number for NSE/BSE/MSEI: INZ000216033 ARN 31751 DPIN-CDSL-206-2003  
CIN L67120MH1994PLC080039 and Maharashtra GSTN No. 27AAACL0963A1ZZ

# V.R. ASSOCIATES

*Company Secretaries*

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Resi: G-5/3 Jal Padma, Bangur Nagar, Goregaon West, Mumbai 400 104  
Admn office: 31 Topiwala Center, Goregaon West, Mumbai 400 062  
Tel: 022-28774306; Mobile 98214 47548; e-mail: [cs.ram25@gmail.com](mailto:cs.ram25@gmail.com)  
GST No. 27ACSPV8251A1Z7 ; MSME Regn no. UDAYAM-MH-18-0050392

## Secretarial compliance report of **LKP SECURITIES LIMITED** for the year ended 31<sup>st</sup> March, 2023

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by LKP SECURITIES LIMITED (hereinafter referred as 'the listed entity'), having its Registered Office at 203, Embassy Centre, Nariman Point, Mumbai 400021. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We V.R.Associates have examined:

- (a) all the documents and records made available to us and explanation provided by LKP SECURITIES 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 31<sup>st</sup> March, 2023 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, including:-

- (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; **(not applicable to the company during the review period)**
- (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)**

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (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;
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- (k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

We hereby report that, during the Review Period the compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance Status (Yes/No)	Observations/ Remarks by PCS
1	<b>Secretarial Standards:</b>  The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.	YES	
2	<b>Adoption and Timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.</li><li></li><li>All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li></ul>	YES	
3	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a</li></ul>	YES	

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	<p>functional website.</p> <ul style="list-style-type: none"><li>• Timely dissemination of the documents/information under a separate section on the website.</li><li>• 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.</li></ul>		
4	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity.</p>	YES	
5	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t :</b></p> <p>(a) Identification of Material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	YES  N.A.	
6	<p><b>Preservation of Documents:</b></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>	YES	
7	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as</p>	YES	

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	prescribed in SEBI Regulations.		
8	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (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.  (c)	YES	
9	<b>Disclosure of events or information:</b>  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	
10	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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 (**).	YES	

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12	<b>Additional Non-compliances if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	YES	
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Compliances related to resignation of Statutory Auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No)	Observations/Remarks by PCS
1	Compliances with the following conditions while appointing/reappointing 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  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  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.	N.A.	
2	Other conditions relating to resignation of statutory auditor:  I. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	N.A.	

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	<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> <p>II. Disclaimer in case of non-receipt of information: 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</p>		
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	<b>circul ars/ guide lines inclu ding specif ic claus e)</b>									
1								<b>FY 2022:</b> Gross acquisition limit of 5% for a financial year was crossed and in our opinion an exemption report was required for inter-se transfer as per regulation 10(6) and 10(7) of SEBI (SAST) Reg, 2011		
2								<b>FY 2021:</b> Noncompliance With the requirements pertaining to the composition of the	The non compliance was made good by appointment of Mr. Mahendra	Complied with the said requirement. The waiver of penalty was

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								Board as per Regulation 17(1) of SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015.	Vasantrai Doshi, as Additional (Non-Independent & Non-Executive) Director on December 14, 2020. The company had appealed to BSE Limited for waiving of penalty of Rs. 10,79,700/-	accepted by BSE Limited vide its email dated 5th July, 2021 to the Company
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Place: Mumbai

Date: 29<sup>th</sup> May, 2023

For *V.R. Associates*

*Company Secretaries*

RAMACHANDRA

N

VENKATRAMAN

*V. Ramachandran*

*Proprietor*

*C.P. No. 4731*

*Membership No. A-7731*

*UDIN: A007731E000404798*

*PRC No: 1662/2022*

Digitally signed by RAMACHANDRAN VENKATRAMAN  
DN: c=IN, postalCode=400104, o=MAHARASHTRA, st=MH, G=53, JAL  
PADMA CHS LTD, 31W ROAD, MUMBAI (BANGUR NAGAR), GOREGAON  
WEST, 400104, IN=KUMBAI, o=Personal,  
serialNumber=728656537546400003074486C14444e2028978  
16ff6625b743738466,  
email=ram25@gmail.com, cn=V. Ramachandran,  
2.5.4.20=9959941.08b2706ca5f578444172574077b5443f615683  
0741e022779f9f, urn=urn:ietf:params:ecdsa:oid:1.3.6.1.5.5.30.1,  
o=RAMACHANDRAN VENKATRAMAN,  
Date: 2023.05.29 14:15:10 +0530'