

June 04, 2020

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 2019-20

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 2019-20.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,
For **LKP Securities Limited**

Akshata Vengurlekar
Company Secretary

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: 1303 – 04, 13th Floor, Raheja Centre, Free Press Journal Marg, Nariman Point, Mumbai – 400021
Tel.: +91 22 6635 1234 . Fax: +91 22 6635 1249 . Website: www.lksec.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

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
GST No. 27ACSPV8251A1Z7 ; PAN: ACSPV8251A; MSME Regn no. MH18D0041106

Secretarial compliance report of LKP Securities Limited for the year ended 31st March, 2020

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”). *Due to ongoing pandemic of Covid-19 and state of lockdown, all the papers, forms, returns filed and other records maintained by the Company, wherever possible, have been checked digitally.*
- (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 31st March, 2020 (“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**
- (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**
- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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and circulars/ guidelines issued thereunder;

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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 18(2)(b) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Requisite number of Independent Directors were not present at the meeting of the Audit Committee held on 2nd May, 2019 as required	Non compliance

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our 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 letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	SEBI	Utilizing the funds of credit balance clients to settle the obligation of debit balance clients, failure in maintaining data pertaining to running account settlement of funds and securities of its clients and utilising the securities	Penalty of Rs.500,000/- comprising of Rs. 2,00,000/- (Rupees Two Lacs) under Section 15A(c) and Rs. 1,00,000/- (Rupees One Lac) under section 15HB of the	The company has paid the penalty on 18 th February, 2020

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		pledged for debit balance clients for settling the obligations of other clients. Violations under SEBI Act, 1992, SEBI (Stock Brokers and Sub Brokers) Regulations 1992 and Securities Contracts (Regulation) Act, 1956 as per SEBI Adjudication Order No. Order/GR/KG/2019-20 /6773 dated 12 th February, 2020	SEBI Act and Rs. 2,00,000/- (Rupees Two Lacs) under Section 23D of the SCRA imposed on the company	
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
N.A	N.A	N.A	N.A	N.A

For *V.R. Associates*
Company Secretaries

V. Ramachandran
ACS: 7731:CP 4731

Place : Mumbai
Date : 4th June, 2020
UDIN: A007731B000315247