

Date :27.05.2022

To,
National Stock Exchange of India Limited
Listing Dept.,
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai – 400051
Scrip Code:EMKAY

BSE Limited
Listing Dept.,
P.J.Tower, Dalal Street,
Fort, Mumbai – 400001
532737

Dear Sirs,

Sub.: Submission of Annual Secretarial Compliance Report for the F.Y 2021-22

Please find enclosed herewith the Annual Secretarial Compliance Report of Emkay Global Financial Services Limited for the year ended 31st March, 2022 issued by M/s. Parikh & Associates, Practicing Company Secretaries.

We request you to kindly take the enclosed Annual Secretarial Compliance Report on record and acknowledge the receipt of the same

Thanking you,

Yours Faithfully,

For **Emkay Global Financial Services Limited**


B.M.Raul
Company Secretary Compliance officer



Encl.: As above



Secretarial Compliance Report of Emkay Global Financial Services Limited for the year ended March 31, 2022

To,
Emkay Global Financial Services Limited
7th Floor, The Ruby, Senapati Bapat Marg,
Dadar (West), Mumbai – 400028

We Parikh & Associates have examined:

- a) all the documents and records made available to us and explanation provided by **Emkay Global Financial Services 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, 2022 (“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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the company during the review period)
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;(Not applicable to the company during the review period)
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the company during the review period)
- g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; (Not applicable to the company during the review period)
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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 |
|----------------|---|-------------------|--|
| ---NIL--- | | | |

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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. |
|----------------|------------------------|-----------------------------|--|---|
| -----NIL----- | | | | |

- 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 <i>(The years are to be mentioned)</i> | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|---|--|
| 1. | Non-compliance of SEBI Circular SMD/SED/CIR/93/23 321 dated November 18, 1993, read with clause A(2) and A(5) of code of conduct prescribed in Schedule II under regulation 9(f) of Stock Brokers Regulations in relation to inspection conducted in the year 2015 for the period 2014-2015. | Year ended March 31, 2020 | The Company has paid the necessary penalty of Rs. 2,00,000/- (Rupees Two Lakhs only) levied vide Adjudication order no. Order/MC/DPS/2019-20/ 5206 dated 25th October, 2019 | -- |
| 2. | Non-compliance SEBI Circular No. MIRSD/ SE /Cir-19/2009 dated December 3, 2009, NSE Circular NSE/INSP/13606 dated December 03, 2009, NSE clarification circular NSE/INSP/14048 dated February 03, 2010 and NSE/INSP/21651 dated September 07, 2012, read with | Year ended March 31, 2020 | The Company has paid the necessary penalty of Rs. 1,00,000/- (Rupees One Lakhs only) levied vide Adjudication order no. Order/MC/DPS/2019-20/ 5206. | -- |

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|--|--|--|--|--|
| | <p>Clause A(2) and A(5) of code of conduct prescribed in Schedule II under regulation 9(f) of Stock Brokers Regulations in relation to inspection conducted in the year 2015 for the period 2014-2015.</p> | | | |
|--|--|--|--|--|

Place: Mumbai
Date: May 24, 2022

For Parikh & Associates

**MITESH
DHABLIWA
LA**

Digitally signed by MITESH DHABLIWALA
DN: c=IN, ou=Personal, postalCode=400056,
st=Maharashtra,
2.5.4.20=93dfe8136c49c0a2d448d481e0a324
bc5d68397e00205ac703726805680b79,
pseudonym=222A764E922364ED9DF2347502
1F08E28C6D4C,
serialNumber=2256A7A95C804FA7001EBCF5
3A8EDC03272635DEB058851E40027F575677
SFA, cn=MITESH DHABLIWALA
Date: 2022.05.24 17:07:55 +05'30'

Signature:

Name of the Practicing Company Secretary:

Mitesh Dhabliwala
Partner

FCS No.: 8331 CP No.: 9511

UDIN: F008331D000372805

PR No.: 1129/2021