

Date: May 30, 2022

To
Bombay Stock Exchange Limited,
1st Floor, P.J. Towers,
Dalal Street, Mumbai - 400001

Scrip Code: 540654

Subject: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2022.

Reference: SEBI Circular CIR/ CFD/ CMD1/ 27/ 2019 dated February 08, 2019 and Regulation 24A of SEBI (LODR) Regulations, 2015

Dear Sir/Madam,

Pursuant to provisions of Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Glosbalspace Technologies Limited issues by M/s. MMJB & Associates LLP, Company Secretaries, for the Financial Year ended March 31, 2022.

Kindly take the same on record

FOR GLOBALSPACE TECHNOLOGIES LIMITED




Swati Arora
Company Secretary and Compliance officer
Membership No. A44529

GLOBALSPACE TECHNOLOGIES LIMITED

CIN:L64201MH2010PLC211219

Formerly known as "GlobalSpace Technologies Private Limited"

Formerly known as "GlobalSpace Technologies Private Limited"

Regd. Off: Office No. 605, 6th Floor, Rupa Solitiare Building, Millennium Business Park, Mahape, Navi Mumbai 400710

Tel.: 022-49452000 | Email: info@globalspace.in | Website: www.globalspace.in

MMJB & Associates LLP

Company Secretaries

803-804, 8th Floor, Ecstasy, City of Joy, JSD Road, Mulund West, Mumbai 400080 (T) 022-21678100

Secretarial Compliance Report of Globalspace Technologies Limited for the financial year ended March 31, 2022

To
The Board of Directors,
Globalspace Technologies Limited
Office no. 605, 6th Floor, Rupa Solitaire Building,
Millennium Business Park, Mahape,
Navi Mumbai - 400710, Maharashtra

We, M/s. MMJB & Associates LLP, Practicing Company Secretaries, have examined:

- (a) All the documents and records made available to us and explanation provided by **Globalspace Technologies 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 on March 31, 2022 ('Review Period') in respect of compliance with the provisions of:
 - (i) The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as "**Listing Regulations**");

- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Listed entity 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 Listed entity during the Review Period)**
- e) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable;
- f) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- g) 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 Listed entity during the Review Period)**
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred as “**PIT Regulations**”);
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009. **(Not applicable to the Listed entity during the Review Period)**

and circulars/ guidelines issued thereunder and also SEBI circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 in respect of Resignation of statutory auditors from listed entities and their material subsidiaries 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:

Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Remarks of the Practicing Company Secretary
Regulation 17(1)(c) of Listing Regulation i.e. the Board shall comprise of not less than Six directors.	The listed entity has less than required number of directors.	There has been drop in number of directors from six to four due to resignation of one independent director and one Executive Director. Further, Corporate governance report filed with Stock exchanges for quarter ended December, 2021 is erroneous.
Regulation 27 (2) of Listing Regulations Corporate Governance report	Lapse in disclosure of Composition of Audit Committee.	The Listed entity has filed Corporate Governance Report for the quarter ended March, 2022, where the appointment and resignation of one the independent director is not disclosed.
Regulation 30 of Listing Regulations Disclosure of events and information within 30 Minutes/24 hours as the case may be under Schedule III of the said regulations	In two instances there were delay in disclosure and in one case the information was not disclosed.	<ul style="list-style-type: none"> ▪ Proceeding of Annual general meeting held on November 26, 2021 was filed to stock exchange was in delay by 3 days. ▪ Brief of altered Memorandum of Association (MOA) has not been disclosed to stock exchange.
Regulation 3(5) of PIT Regulations: The Board of Directors or head of the organisation of every person require to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with	The structured digital database is not updated completely.	The listed entity has structured digital database. However, the same is not updated.

whom information is shared under this regulation along with the Permanent Account Number. Such database shall not be outsourced and shall be maintained internally.		
SEBI circular dated 23-09-2020 SEBI/CIR/CFD/DCR1/CIR/P/2020/181_System Driven Disclosure	Delay in intimating to designated depository w.r.t. system driven disclosure	There was delay in intimation to designated depository

(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.
Not Applicable				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 30 of Listing Regulation requires Every listed entity shall make	March 31, 2021	The Listed entity is striving/ endeavouring to avoid such lapses in	-

disclosures of material event and information as soon as reasonably possible and not later than twenty-four hours from the occurrence of event or information.		future on a continuous basis.	
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**For MMJB & Associates LLP
Practicing Company Secretaries**

DEEPTI AMEY KULKARNI
Digitally signed
by DEEPTI AMEY
KULKARNI
Date: 2022.05.30
21:06:17 +05'30'

**Deepti Kulkarni
Designated Partner**

ACS No: A34733

CP No. 22502

Peer Review No: 904/2020

UDIN: A034733D000438620

Place: Mumbai

Date: May 30, 2022