



To,

Date: 17.05.2022

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|---|--|
| The Manager BSE Limited P. J. Towers, Dalal Street Mumbai-400001 (BSE Scrip Code: 532521) | The Manager, NSE Limited, Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai- 400051. (NSE Symbol: PALREDTEC) |
|---|--|

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31.03.2022 as per regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Unit: Palred Technologies Limited

We wish to submit Annual Secretarial Compliance Report issued by Mr. Vivek Surana Practicing Company Secretary under regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, read with clause 3(b)(iii) of the SEBI circular number. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for the information and records of the exchange, please.

Thanking you.

Yours faithfully,

For Palred Technologies Limited



Shruti Mangesh Rege
Company Secretary

PALRED TECHNOLOGIES LIMITED

CIN: L72200TG1999PLC033131

Regd. Office: H.No. 8-2-703/2/B, Plot.No.2 Road.No.12, Banjara Hills, Hyderabad, Telangana-500034. Tele: +9140 67138810 | Website: www.palred.com



Vivek Surana & Associates

Practicing Company Secretaries

To,

Date: 16.05.2022

The Board of Directors
M/s. Palred Technologies Limited
Plot No 2, 8-2-703/2/B, Road No 12,
Banjara Hills, Hyderabad,
Telangana, 500034

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2021-22

We have been engaged by Palred Technologies Limited (hereinafter referred to as 'the Company') bearing CIN: L72200TG1999PLC033131 whose equity shares are listed on National Stock Exchange of India Limited (Symbol: **PALREDTEC**) and BSE Limited (Security Code: **532521**) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

This audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Vivek Surana & Associates

Vivek Surana
Proprietor

M. No. A24531, CP No. 12901



Place: Hyderabad

Date: 16.05.2022

UDIN: A024531D000329319



Vivek Surana & Associates

Practicing Company Secretaries

Secretarial Compliance Report of Palred Technologies Limited For the Financial Year Ended 31st March, 2022

We, Vivek Surana & Associates, Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Palred 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 31st March, 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 there under; and
- (b) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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**

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- (e) 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: **Not Applicable.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; and Amended Regulations 2019. **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **Not Applicable**
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Amended Regulations 2018.

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 there under wherever applicable, 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 wherever applicable, there under in so far as it appears from my/our examination of those records.
- (c) The following are the actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating





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Procedures issued by SEBI through various circulars) under the aforesaid Acts / Regulations and circulars/ guidelines issued there under:

| Sl. 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 previous reports | Observations made in the Secretarial compliance report for the year ended 31.03.2021 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--------|--|--|--|---|
| 1. | Regulation 18 & 20 SEBI (Listing Obligations and Disclosure Requirements), 2015. | Non-compliance with the requirements pertaining to the composition of the Audit Committee and Stakeholders Relationship Committee for the period from 31.08.2020 to 30.09.2020 | Audit Committee and Stakeholders Relationship Committees reconstituted u/r 18 and 20 of the SEBI (LODR) Regulations 2015 | Complied with provisions of regulations 18 and 20 of the SEBI (LODR) Regulations, 2015. |





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- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD 11114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For Vivek Surana & Associates

Vivek Surana
Proprietor

M. No. A24531, CP No. 12901



Place: Hyderabad

Date: 16.05.2022

UDIN: A024531D000329319