

Ref: SK/CHN/2021-22/E012

June 30, 2021

National Stock Exchange of India Ltd. Capital, Market – Listing, Exchange Plaza, 5th Floor, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra (E), Mumbai 400 051.	BSE Ltd, 25th Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai 400 001.
EQ- SECURKLOUD– ISIN NO- INE650K01021	Scrip Code: 512161 - ISIN NO-INE650K01021

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021.

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we enclose herewith the Annual Secretarial Compliance Report issued by M/s. P Sriram & Associates, Practicing Company Secretaries for the year ended 31st March, 2021. Kindly take the above information on record.

We request you to kindly take the above information on record.

Yours Truly,
For SecureKloud Technologies Limited



G Sri Vignesh
Company Secretary and Compliance Officer
Membership No: A57475



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**SECRETARIAL COMPLIANCE REPORT OF SECUREKLOUD TECHNOLOGIES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

I, P. Sriram, Proprietor of P. Sriram & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by Securekcloud 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, 2021 ("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, 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.





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- (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*)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014(*Not Applicable to the company during the review period*)
- (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 (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (j) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

Based on the above examination, I 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:-





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Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	NIL	NIL	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 my examination of those records.

The Company had received a mail communication from Securities & Exchange Board of India seeking clarification on the suspected offence involving fraud as reported by the Deloitte Haskins & Sells LLP ("Deloitte), erstwhile statutory auditors of the Company dated February 12, 2020 for which the Company had submitted its reply dated 29th February, 2020. Subsequently SEBI had raised further queries in this regard. The company had submitted its reply vide mail dated 13th July, 2020. Further, the Company had received a letter from SEBI to conduct a forensic audit for the financial years 2018, 2019, 2020 and 2021 till Dec 2020 on March 25, 2021 and requested the Company to cooperate with the Investigating Authority and provide information sought by the forensic auditor appointed by SEBI. The Company has made detailed representation on April 15, 2021 for dropping the forensic audit and sought certain clarifications vide their letter dated 24th May, 2021 in response to SEBI email dated 18th May, 2021 and are awaiting further response from SEBI.






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- (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	NIL	NIL	NIL	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 31 st March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

For P Sriram & Associates



P. Sriram

FCS No.: 4862

C P No.: 3310

UDIN: F004862C000430507

Place: Chennai
Date: 07/06/2021