

**SOFTRAK VENTURE INVESTMENT LIMITED**



Reg. Office: 201, Moon light Shopping Centre, Nr. Maruti Towers,  
Drive in Road, Memnagar, Ahmedabad - 380052 Gujarat  
Email Id: softtrakventure@gmail.com CIN: L99999GJ1993PLC020939, Phone  
No.: 9687002358

29<sup>th</sup> June, 2020

To  
The General Manager-Listing  
Corporate Relationship Department  
BSE Limited, Ground Floor,  
P.J. Towers, Dalal Street, Mumbai

Scrip Code: 531529

Dear Sir/Madam,

Sub: Compliance with the Regulation 24A of SEBI (Listing  
Obligation and Disclosure Requirements) Regulations, 2015 for the year  
ended 31<sup>st</sup> March, 2021

Pursuant to the Regulation 24A of the Securities and Exchange Board of India (Listing obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019, please find enclosed herewith Annual secretarial compliance Report for the financial year 2020-2021 issued by Rupali Modi, Practicing Company Secretary.

We request you to take the above information on your records and disseminate the same to the investors through the website.

Thanking you.

Yours faithfully

FOR, SOFTRAK VENTURE INVESTMENT LIMITED  
For, Softrak Venture Investment Limited

  
AUTHORIZED SIGNATORY/DIRECTOR

Raghvendra Gopalrao Kulkarni

Director

DIN: 06970323

Place: Ahmedabad

Encl: as above

**RUPALI MODI**  
**Practicing Company Secretary**

**B-601 Samarpan Palace**  
**Dattapada Road, Borivali (E)**  
**Mumbai, - 400066**  
*Email: [csrupalimodi@gmail.com](mailto:csrupalimodi@gmail.com)*

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**SECRETARIAL COMPLIANCE REPORT OF SOFTRAK VENTURE  
INVESTMENT LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

I, Rupali Modi, Practicing Company Secretary, having office B- 601 Samarpan Palace Behind HDFC Bank Dattapada Road, Borivali East Mumbai 400066 have examined:

- (a) all the documents and records made available to us and explanation provided by Softrak Venture Investment Limited ("the listed entity") having registered office at 201, Moon Light Shopping Centre, Nr. Maruti Towers, Drive in Road, Memnagar, Ahmedabad - 380052,
- (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 31<sup>st</sup> March, 2021 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 thereunder 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 as there is no instance of Buyback during the year under review
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable as there is no instance of Share Based Employee Benefits during the year under review
  - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review
  - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review
  - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued there under;



and based on the above examination, I hereby report that, during the Review Period:

- (a) *The securities of the Company are under suspension.* The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, 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
2	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Late submission of Annual Report for FY 2019-20	The Company has submitted Annual Report for FY 2019-20 on 27/01/2021 i.e. not within due date of filing.
6	Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the Equity Listing Agreement and Rules, Bye-laws and Regulations of the Exchange	Delay payment of Annual listing fees	The Company has not paid Annual listing fee for the F.Y. 2020-21.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my 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 there under:

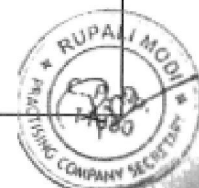
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.



1	Securities of the Company are under suspension on BSE Limited. The company is in process of revocation of suspension with BSE Limited		
2			

(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	Regulation 47(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non publication of notice of the Board Meeting where financial result has been discussed and financial result in newspaper	The Company has not published notice of meeting of the board of directors where financial results shall be discussed and financial results in newspaper.	The Board of Directors of the Company has taken serious note of the non-compliance and onwards, the Company has complied with the requirement.
2	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non submission of Annual Report for FY 2018-19	The Company has not submitted Annual Report for FY 2018-19	The Board of Directors of the Company has taken serious note of the non-compliance and onwards, the Company has complied with the requirement.
3	Regulation 33(2)(c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Limited Review Report for the quarter ended on 30 <sup>th</sup> June, 2019 and 30 <sup>th</sup> September, 2019 not placed before the Board of Directors of the Company at its meeting which approves the financial results.	The Company has not placed Limited Review Report for the quarter ended on 30 <sup>th</sup> June, 2019 and 30 <sup>th</sup> September, 2019 before the Board of Directors of the Company at its meeting which approves the financial results. Also not submitted the same to BSE Limited	The Board of Directors of the Company has taken serious note of the non-compliance and onwards, the Company has complied with the requirement.



4	Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non appointment of Company Secretary	The Company has appointed Ms. Arpita Mittal as a Company Secretary and compliance officer on 09.12.2019 during the year under review.	The Company has appointed Ms. Arpita Mittal as a Company Secretary and compliance officer on 09.12.2019 during the year under review.
5	Regulation 19(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non-compliance w.r.t. Composition of Nomination and Remuneration Committee	The Company is in violation of composition of Nomination and Remuneration Committee during the year under review.	The Company has appointed Mr. Sarjeevan Singh on 15/06/2020 as a Non-Executive Independent Director and also member of Nomination and Remuneration Committee during the year under review.
6	Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the Equity Listing Agreement and Rules, Bye-laws and Regulations of the Exchange	Delay payment of Annual listing fees	The Company has not paid Annual listing fee for the F.Y. 2020-21.	Company has paid Annual listing fee for the F.Y. 2020-21.
7	Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not submitted Annual Secretarial Compliance Report to BSE Limited for FY 2018-19	The Company has not submitted Annual Secretarial Compliance Report to BSE Limited for FY 2018-19	The Board of Directors of the Company has taken serious note of the non-compliance and onwards, the Company has complied with the requirement.

Rupali Modi

Practicing Company Secretary

C. P. No. 11350

Membership No. 25467



**Place: Mumbai**

**Date: 29<sup>th</sup> June, 2021**

**UDIN A025467C000539101**