SUMMIT SECURITIES LIMITED

Corporate Identification Number: L65921MH1997PLC194571
Registered Office: 213, Bezzola Complex, B Wing, 71, Sion-Trombay Road, Chembur, Mumbai - 400071
Tel No.: +91-22-25292152/54/55 Fax No: +91-22-25297423

Website: www.summitsecurities.net Email: investors@summitsecurities.net; compliance@summitsecurities.net

May 23, 2022

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor, Plot No C/1, G Block, Bandra Kurla Complex, Bandra East, Mumbai -400 051. **BSE Limited**

Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai – 400 001.

Symbol: SUMMITSEC

Security ID: SUMMITSEC

Sub.: Annual Secretarial Compliance Report for the Year Ended March 31, 2022.

Dear Sir.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Regulations) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, issued by M/s. Parikh Parekh & Associates, Practising Company Secretaries.

Kindly take the same on record.

Thanking you

For Summit Securities Limited

∠ Jiya Gangwani

Company Secretary

Encl: As above



Office: 111, 11th floor, Sai-Dwar CHS Ltd., SAB TV Lane, Opp. Laxmi Industrial Estate, Off Link Road, Above Shabari Restaurant, Andheri (West), Mumbai-400 053.

Tel.: 26301232 / 26301233 Email: cs@parikhassociates.com Website: www.parikhassociates.com Firm Unique Code: P1987MH010000

Secretarial Compliance Report of Summit Securities Limited for the year ended March 31, 2022

To, Summit Securities Limited 213, Bezzola Complex, B Wing, 71, Sion-Trombay Road, Chembur, Mumbai - 400071

We Parikh & Associates have examined:

- a) all the documents and records made available to us and explanation provided by **Summit Securities 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; (Not applicable to the company during the review period)

- 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 Participants) 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, <u>except</u> in respect of matters specified below:-

| Sr. | Compliance Requirement | Deviations | Observations/ | | | |
|-----|-------------------------------|------------|----------------|--|--|--|
| No. | (Regulations / circulars/ | | Remarks of the | | | |
| | guidelines including specific | | Practicing | | | |
| | clause) | | 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. | Action taken | Details of | Details of | Observations/ | | | |
|-----|--------------|------------|-----------------|----------------|--|--|--|
| No. | by | violation | action taken | remarks of the | | | |
| | | | E.g. fines, | Practicing | | | |
| | | | warning letter, | Company | | | |
| | | | debarment, | Secretary, if | | | |
| | | | etc. | any. | | | |
| NIL | | | | | | | |
| | | | | | | | |

d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. | Observations | Observations | Actions taken | Comments of | | | |
|-----|---|--|---------------------------------|--|--|--|--|
| No. | of the Practicing Company Secretary in the previous reports | made in the secretarial compliance report for the year ended | by the listed entity, if any | the Practicing Company Secretary on the actions taken by the listed entity | | | |
| | Not Applicable | | | | | | |

For Parikh Parekh & Associates

Place: Mumbai Date: May 19, 2022

Signature:

Name of the Practicing Company Secretary:

Shalini Bhat

Partner

FCS No:6484 CP No: 6994 UDIN: F006484D000345977

PR No.: 723/2020