

November 11, 2022

To,
Department of Listing Operations
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

Trading Symbol: **SECMARK**
Scrip Code: **543234**

Dear Sir/Madam,

Sub: Nil Statement on Deviation(s) or Variation(s) under Regulation 32(1) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 ("Listing Regulations").

Pursuant to the provisions of Regulation 32 of the Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/162/2019 dated December 24, 2019 regarding "Format on statement of Deviation or Variation for proceeds of public issue, rights issue, preferential issue, Qualified Institutions Placement (QIP) etc.", we hereby confirm that there is no deviation in the use of proceeds from the objects stated in the prospectus dated September 09, 2020 issued for the Initial Public Offering of equity shares of the Company. A Nil Statement of Deviation, duly reviewed by the Audit Committee of the Company in their meeting held on November 11, 2022 is given in "Annexure-A".

The proceeds raised by the Company through the Initial Public Offering of equity shares of the Company, during the half year ended September 30, 2022, have been utilized for the objects as stated in prospectus dated September 09, 2020.

You are requested to disseminate the above information on your website.

This intimation is also being uploaded on the Company's website at www.secmark.in

Thanking you

Yours faithfully,

For **SecMark Consultancy Limited**

Sunil Kumar Bang
Company Secretary and Compliance Officer

Place: Mumbai

Enclosure: Annexure A

Annexure A

Statement of Deviation / Variation in utilization of funds raised

Name of listed entity – SecMark Consultancy Limited

Mode of Fund Raising – Public Issues / ~~Rights Issues~~ / Preferential Issues / QIP / Others

Date of Raising Funds – September 29, 2020

Amount Raised - Rs.1503.90Lakhs

Report filed for ~~Quarter~~/Half year ended – September 30, 2022

Monitoring Agency – Not applicable

Monitoring Agency Name, if applicable – Not Applicable

Is there a Deviation / Variation in use of funds raised- No

If yes, whether the same is pursuant to change in terms of a contract or objects, which was approved by the shareholders- Not Applicable

If Yes, Date of shareholder Approval – Not Applicable

Explanation for the Deviation / Variation – Not Applicable

Comments of the Audit Committee after review – Funds are utilized for the objects as stated in prospectus dated September 09, 2020 and there is no deviation

Comments of the auditors, if any – Nil

Objects for which funds have been raised and where there has been a deviation, in the following table

Original Object	Modified Object, if any	Original Allocation	Modified allocation, if any	Funds utilised	Amount of Deviation /Variation according to applicable object	Remarks if any
To finance development and/or procurement of technology, applications, software, infrastructure etc. including strategic acquisitions of Firms/Companies in the technology space to complement and enhance our Company's value proposition.	No Modification	Rs. 460.00 Lakhs	Not Applicable	Rs.460.00 Lakhs	No Deviation	Not Applicable
To expand and retain our Leadership team that will lead the Company into the next phase of growth	No Modification	Rs. 300.00 Lakhs	316.51 Lakh *	Rs.316.51 Lakhs	No Deviation	Not Applicable
To acquire / rent assets	No Modification	Rs. 150.00 Lakhs	Not Applicable	Rs. 150.00 Lakhs	No Deviation	Not Applicable
Repayment of bank facilities	No Modification	Rs. 150.00 Lakhs	Not Applicable	Rs.150.00 Lakhs	No Deviation	Not Applicable
General corporate purposes	No Modification	Rs. 339.90 Lakhs	Not Applicable	Rs. 339.90 Lakhs	No Deviation	Not Applicable

Deviation or variation could mean:

(a) Deviation in the objects or purposes for which the funds have been raised or

(b) Deviation in the amount of funds actually utilized as against what was originally disclosed or

(c) Change in terms of a contract referred to in the fund raising document i.e. prospectus, letter of offer, etc

* Note: The total issue expenses for IPO was estimated for Rs. 104.00 Lakh. As mentioned in the prospectus for IPO, if the actual expenses incurred is less than the estimated, the balance will be utilised against object - "To expand and retain our Leadership team that will lead the Company into the next phase of growth". Actual expenses incurred in this regard were Rs. 87.49 Lakh. Hence the balance amount of Rs. 16.51 Lakh has been added to Rs. 300 Lakh of original allocation of the said object. Thus, the modified allocation comes to Rs. 316.51 Lakh

Name of Signatory – Sunil Kumar Bang

Designation – Company Secretary