

April 29, 2021

To,
Dept. of Corporate Services (CRD)
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Scrip Code: 540192

Dear Sir / Madam,

Sub: Annual Secretarial Compliance Report for Financial Year 2020-21

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report for the financial year 2020-21.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,

For **LKP Securities Limited**

Akshata
Akshata Vengurlekar
Company Secretary



Encl.: As above

LKP Securities Ltd.

Regd Off: 203 Embassy Centre, Nariman Point, Mumbai – 400021, Phone: 022 – 2282 8234, Fax 022 – 2284 2415

Head Off: 1303 – 04, 13th Floor, Raheja Centre, Free Press Journal Marg, Nariman Point, Mumbai – 400021

Tel.: +91 22 6635 1234 . Fax: +91 22 6635 1249 . Website: www.lkpsec.com,

Single SEBI registration number for NSE/BSE/MSEI: INZ000216033 ARN 31751 DPIN-CDSL-206-2003

CIN L67120MH1994PLC080039 and Maharashtra GSTN No. 27AAACL0963A1ZZ

V.R. ASSOCIATES

Company Secretaries

Resi: G-5/3 Jal Padma, Bangur Nagar, Goregaon West, Mumbai 400 104
Admn office: 31 Topiwala Center, Goregaon West, Mumbai 400 062
Tel: 022-28774306; Mobile 98214 47548; e-mail: cs.ram25@gmail.com
GST No. 27ACSPV8251A1Z7 ; PAN: ACSPV8251A; MSME Regn no. MH18D0041106

Secretarial compliance report of LKP Securities Limited for the year ended 31st March, 2021

We V.R. Associates have examined:

- (a) all the documents and records made available to us and explanation provided by LKP 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 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, 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; - **Not Applicable**
 - (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**
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable**
 - (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not Applicable**
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued thereunder;

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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 thereunder, **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
1	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Board of directors of the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.	The non compliance was made good by appointment of Mr. Mahendra Vasantrai Doshi, as Additional (Non-Independent & Non-Executive) Director on December 14, 2020.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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. 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.	BSE Limited	Non-compliance with the requirements pertaining to the composition of the Board as per Regulation 17(1) of SEBI (Listing	Email for fine of Rs. 10,79,700/- was received by the Company, due to said non-compliances for two consecutive	The Company has appealed for waiving of the penalty levied for non-compliances under Regulation 17(1) of SEBI (Listing

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		Obligations and Disclosure Requirements) Regulations, 2015.	quarters i.e. June 2020 & September 2020.	Obligations and Disclosure Requirements) Regulations, 2015 and matter is pending.
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(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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Requisite number of Independent Directors were not present at the meeting of the Audit Committee held on 2nd May, 2019 as required.	31st March, 2020	No actions could be taken by the Company	N.A as no action could be taken.

Due to ongoing pandemic of Covid-19, all the papers, forms, returns filed and other records maintained by the Company, wherever possible, have been checked virtually,

For **V.R. Associates**
Company Secretaries

V. Ramachandran
ACS: 7731; CP 4731

Place : Mumbai

Date : April 27, 2021

UDIN: **A007731C000196645**