

Reg. Office: 201, Moon light Shopping Centre, Near Maruti Towers,  
Drive in Road, Memnagar, Ahmedabad - 380052 Gujarat  
Email Id: softrakventure@gmail.com CIN: L99999GJ1993PLC020939, Phone No.: 9824695328

30<sup>th</sup> May, 2022

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, 2022**

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 2021-2022 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

Bhoomi Patel  
Director (DIN: 08316893)

**RUPALI MODI**  
Practicing Company Secretary

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

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**SECRETARIAL COMPLIANCE REPORT OF SOFTRAK VENTURE  
INVESTMENT LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

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, 2022 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;



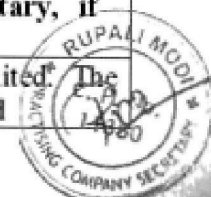
and based on the above examination, I hereby report that, during the Review Period:

- (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
1.	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Late submission of Annual Report for FY 2020-21	The Company has not maintained timelines of sending annual report as prescribed under Regulation 34 of SEBI (LODR), 2015.
2.	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. 2021-22.

- (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			



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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... <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 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.	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 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	Nil	The Company has not paid Annual listing fee for the F.Y. 2020-21 till date.

Date: 29/05/2022

Place: Mumbai

*Rupali Modi*

**Rupali Modi**  
**C. P. No.: 11350**  
**Membership No. 25467**  
**UDIN: A025467D000422336**

