



**SECRETARIAL COMPLIANCE REPORT OF ALLSEC TECHNOLOGIES LIMITED FOR THE YEAR
ENDED 31.03.2022**

I have examined:

- (a) documents and records made available to us and explanation provided by ALLSEC TECHNOLOGIES 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 31.03.2022 ("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, 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-The Company has not issued any shares/security during the financial year under review and hence not applicable;

- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011- During the financial year under review, there were no acquisition of shares and hence not applicable;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - The Company has not bought back any of its securities during the financial year under review and hence not applicable;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014-Not Applicable to the Company during the financial year under review;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 -During the financial year under review the Company has not issued any debt securities and hence not applicable;
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013 - During the financial year under review the Company has not issued any Non-Convertible Redeemable Preference Shares and hence not applicable;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

Based on the above examination, I 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:

S.No.	Compliance Requirement (Regulations/Circulars/guideline including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	As per Regulation 18(2)(a) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the gap between two	The gap between the Audit committee meeting for the first quarter exceeded 120 days(20/01/2021	The Company has originally scheduled its Board Meeting and Audit Committee meeting for the first quarter on

	audit committee meeting shall not exceed 120 days.	and 26/05/2021- 125 days gap).	<p>21.05.2021. However due to Covid restrictions, the meetings were re-scheduled and held on 26/05/2021. The fact of re-scheduling of Board Meeting has been communicated to the stock exchange.</p> <p>MCA in its circular No. 08/2021 has extended the gap between two Board meeting to 180 days. However there is no exemption for audit committee meeting.</p>
2.	As per Regulation 19(1)(c) of SEBI (Listing Obligations Disclosure Requirements) Regulations, 2015, with effect from 01.01.2022, in the Nomination and Remuneration Committee, at least two third of the directors shall be Independent Directors	The Company's NRC comprised of two Independent Directors and two Non Independent Directors.	The Company has re-constituted the NRC in its Board Meeting 14.05.2022 wherein Mr. Narayanaswamy Ravi Vishwanath has resigned from the Committee and the requirements of the said Regulation has been complied by the Company as on the date of this report.

(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 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:

S.No.	Actions taken by	Details of Violation	Details of action taken	Observations/Remarks of the Practicing Company Secretary, if any.
NIL				

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

S.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
NOT APPLICABLE				

For Mohan Kumar & Associates



A. Mohan Kumar

Practicing Company Secretary

Membership Number: FCS 4347

Certificate of Practice Number: 19145

UDIN:F004347D000340133

Place: Chennai

Date: 14-05-2022