SecUR Credentials
Now it's safe
India's first background screening company listed on NSE Emerge.

June 29, 2021

To,
The Manager,
National Stock Exchange of India Limited,
Exchange Plaza,
Bandra Kurla Complex, Bandra (E),
Mumbai 400 051.

Dear Sir,

Ref: Scrip – SECURCRED

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021. This is for your information and records.

This is for your information and records.

Thanking you,

For Secur Credentials Limited

Rahul Belwalkar

Digitally signed by Rahul Belwalkar
DN: c=IN, st=Maharashtra, 2.5.4.20=9800611732d3c715b86040be164ae8133b57c54f624b31264a3f7078a6608620cc, postalCode=400057, street=6, ANJANESHWAR,TEJPAL SCHEME ROAD NO.3,VILEPARLE EAST,Mumbai,VileparleEast),Andheri,Mumbai Suburban, serialNumber=57dd5a2641e0892426c287e396b66e36d739d7227d121aad87e0f7df3b2086fe, o=Personal, cn=Rahul Belwalkar, title=7089, pseudonym=6ad007ec3fb3508edf0616e44f041c7
Date: 2021.06.29 17:48:00 +05'30'

Rahul Belwalkar
Managing Director
DIN: 02497535

Richi Prerak & Associates
Practicing Company Secretaries

Secretarial Compliance Report of Secur Credentials Limited
(CIN: L74110MH2001PLC133050)
For the year ended March 31, 2021

We have examined:

a) all the documents and records made available to me and explanation provided by Secur Credentials 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, 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 as no fresh capital was raised during the term under review
c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; Applicability with respect to Annual Disclosures
d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable as no securities were brought back during the term under review
e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable no such scheme was introduced for Employees

Add: 202, Sunrise Avenue, B/s Hotel Cosmopolitan, Commerce Six Roads, A'bad -380009
Office Phone: 8487877677 | **Website:** www.rpassociates.org
E-mail id: info@rpassociates.org | complianceportfolio@gmail.com

f) Securities and Exchange Board of India (issue and Listing of Debt Securities) Regulations, 2008; Not Applicable as no Debt securities are listed or issued by the Company
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 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, except in respect of matters specified below: -

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of Practicing Company Secretary
1.	Regulation76 of SEBI (Depositories and Participant) Regulations, 2018	Delay in Submission of Reconciliation share Capital Audit Report for Quarter ended March 31, 2020	Filed on June 24, 2020
2.	Regulation 33 of SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Financial Results for year ended on March 31, 2020	Filed on August 20, 2020
3.	Regulation40 (9)/ (10) of SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Certificate under 40 (9)/ (10) for half year ended on March 31, 2020	Filed on June 15, 2020
4.	SEBI (Prohibition of Insider Trading) Regulations, 2015	Delay in Closure of Trading Window for half year ended September 30, 2020	Intimated on October 10, 2020
5.	Regulation 31(1) (b)SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Shareholding Pattern for the half year ended on September2020	Filed on October 23, 2020

6.	Regulation 33 of SEBI(Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Financial Results for half year ended on September 2020	Filed on March 06, 2021
7.	Regulation 76 (Depositories and Participant Regulations), 2018	Delay in Submission of Reconciliation share Capital Audit Report for Quarter ended September 30, 2020	Filed on November 2, 2020
8.	Regulation 30 of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011	Annual Disclosures Not Submitted for the Financial year ended March 31, 2020	As No records were provided for purpose of Audit, we conclude as per remark written in left column.

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 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:

Sr. No.	Action Taken by	Details of Violation	Details of Action taken e.g. fines, warning letter, debarment, etc.	Observations/ Remarks of Practicing Company Secretary
1.	NSE	Regulation 33 under SEBI (LODR) 2015	Notice dated January 12, 2021 and February 10, 2021 Trading in securities suspended due to non-compliance of Reg 33 of SEBI (LODR) 2015 for Sept 30, 2020 and March 31, 2020*	No further observations required
2.	NSE	Regulation 31 under	Notice dated November	No further

		SEBI (LODR) 2015	17, 2020 and December 4, 2020 fine of Rs. 4,720/- including GST (2 days) for quarter Sept 30, 2020	observations required
3	NSE	Regulation 33 under SEBI (LODR) 2015	Notice dated August 18, 2020 fine of Rs. 94,400/- including GST (1st Notice) for year ended March 31, 2020 & Shifting of trading in Securities was moved to Z category vide Notice dated January 12, 2021	No further observations required
4	NSE	Regulation 33 under SEBI (LODR) 2015	Notice dated December 14, 2020 fine of Rs.1,71,100/- including GST (27 Days) for year ended March 31, 2020	No further observations required
5	NSE	Regulation 33 under SEBI (LODR) 2015	Notice dated October 22, 2020 fine of Rs. 4,77,900/- including GST (81 days) for year ended March 31, 2020	No further observations required

* NSE has suspended Trading in securities due to non-compliance of Reg 33 of SEBI (LODR) 2015.

* Data provided above is based upon access to penalty / fine imposition mails and letters as provided to us by the Management for purpose of conducting Audit.

* Website of the Company though being functional does not have certain contents and disclosures as required under Regulation 46 of SEBI (LODR), 2015.

* Demat accounts of Promoters have been freezed by the Depositories vide order from the Exchange.

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
Not Applicable				

For Richi Prerak & Associates
Practicing Company Secretaries

Richi Mineshkumar Shah
Digitally signed by Richi Mineshkumar Shah
Date: 2021.06.29 17:52:52 +05'30'

Richi M. Shah
Partner
M.No.: 47622 | C.P.: 20539
FRN: P2018GJ071000
UDIN: A047622C000535221

June 29, 2021
Ahmedabad

Note: *The State Governments has imposed certain restrictions including free movement of people for prevention and containment of Covid-19. Therefore, we were not able to personally visit the office of the Listed Entity for verification of physical documents and have obtained most of the documents in electronic mode. The explanations from the concerned officials of the Listed Entity have been obtained either orally or electronically.*