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

May 30, 2022

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

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")
Ref: Scrip – SECURCRED

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, 2022 given by M/s. Richi Prerak and Associates.

This is for your information and records.

Thanking you,
For Secur Credentials Limited

RAHUL BELWALKAR
Digitally signed by RAHUL BELWALKAR
Date: 2022.05.30 17:52:31 +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, 2022

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, 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; 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 and event-based Disclosures

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

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 as no such scheme was introduced for Employees
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 as no such preference shares are listed or issued by the Company
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.	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Financial Results for year ended on March 31, 2021	Filed on November 23, 2021
2.	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015	Delay in Submission of Financial Results for half year ended on September 30, 2021	Filed on December 25, 2021
3.	SEBI's Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019	Non-Compliance of the Para 6 (A) (ii) of the said Circular*	-
4.	Regulation 33 of SEBI	Submission of Consolidated	-

	(Listing Obligations and Disclosure Requirement) Regulations, 2015	Financial Statements mandated for HY 1 of the financial year 2021-22.	

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	Fine of Rs.8,61,400/- including GST for year ended March 31, 2021	No further observations required
2	NSE	Regulation 33 under SEBI (LODR) 2015	Notice dated December 14, 2021 fine of Rs. 1,71,100/- including GST for half year ended September 30, 2021	No further observations required

* Disclaimers / Notes:

1. 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.

2. As per the Section 96 of Companies Act, 2013, Company needs to held its Annual General Meeting within a period of 6 months from the closure of Financial Year. – The company has non complied the said provision and held its Annual General Meeting for FY 2020-21 on December 28, 2021.

3. As explained to us, the Company made all possible efforts to convince the resigning Auditor to issue Limited Review Reports as required by SEBI's circular, but it was the Auditor, who denied to certify and issue any such further reports.

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 FY to which such comments pertain	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Delay in Submission of Reconciliation share Capital Audit Report for Quarter ended March 31, 2020	2019-20	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	2019-20	Filed on August 20, 2020	-
3.	Regulation 40 (9)/ (10) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015	2019-20	Filed on June 15, 2020	-

	Delay in Submission of Certificate under 40 (9)/ (10) for half year ended on March 31, 2020			
4.	SEBI (Prohibition of Insider Trading) Regulations, 2015 Delay in Closure of Trading Window for half year ended September 30, 2020	2020-21	Intimated on October 10, 2020	-
5.	Regulation 31(1) (b) of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 Delay in Submission of Shareholding Pattern for the half year ended on September2020	2020-21	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	2020-21	Filed on March 06, 2021	-
7.	Regulation 76 (Depositories and Participant Regulations), 2018	2020-21	Filed on November 2, 2020	-

	Delay in Submission of Reconciliation share Capital Audit Report for Quarter ended September 30, 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	2019-20	-	Not Filed
9.	Regulation 46 Website Updation	2020-21	-	Website Updated
10.	Trading Suspension and Promoters Demat accounts Freezed	2020-21	-	Suspension Revoked and accounts released

For Richi Prerak & Associates

Practicing Company Secretaries

Richi Mineshkumar Shah

Digitally signed by Richi Mineshkumar Shah
Date: 2022.05.30 18:06:49 +05'30'

Richi M. Shah

Partner

FCS No.: 11615 | C.P.: 20539

PRN: 1760/2022

FRN: P2018GJ071000

UDIN: F011615D000418329

May 30, 2022

Ahmedabad