
**SECRETARIAL COMPLIANCE REPORT
LIKHAMI CONSULTING LIMITED
FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2021**

I, Veenit Pal, have examined:

- a) All the documents and records made available to me and explanation provided by M/s Likhmi Consulting Limited (CIN:- L45209WB1982PLC034804) ("the listed entity")
- b) The filing/submission made by the listed entity to the stock exchange,
- c) Website of the listed entity,
- d) Any other documents/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31.03.2021 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 to the Company during the Audit period)
- 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 to the Company during the Audit period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Audit period)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company during the Audit period)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the Company during the Audit period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2018 regarding the Companies Act and dealing with client;

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- j) Securities and Exchange Board of India (Depositories and Participants), Regulations, 2018; and circulars/guidelines issued thereunder;

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	Observation/Remarks of the Practicing Company Secretary
1	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 – Non-compliance with the requirement pertaining to the composition of the Board.	Bombay Stock Exchange Limited imposed a fine of Rs. 4,55,000/- plus GST @18% towards fine for the quarter ended June, 2020.	The Company has paid the fine of Rs. 536900.00 vide cheque no. 327887 dated 24.12.2020.
2	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 – Non-compliance with the requirement pertaining to the composition of the Board.	Bombay Stock Exchange Limited imposed a fine of Rs. 2,60,000/- plus GST @18% towards fine for the quarter ended Sept, 2020	The Company has paid the fine of Rs. 306800.00 vide cheque no. 327888 dated 24.12.2020.

- b) The listed entity has maintained proper records under the provision 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 the Practicing Company Secretary, if any
1.	The Company has paid the fine of Rs. 536900.00 vide cheque no. 327887 dated 24.12.2020.	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	Bombay Stock Exchange Limited imposed a fine of Rs. 4,55,000/- plus GST @18% towards penalty for the quarter ended June, 2020.	In this regard, Company's Representation for waiver of fine was placed before the "Committee for Reviewing Representations for waiver of fines levied under Standard Operating Procedure (SOP)".
2.	The Company has paid the fine of Rs. 306800.00 vide cheque no. 327888 dated 24.12.2020.	Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	Bombay Stock Exchange Limited imposed a fine of Rs. 2,60,000/- plus GST @18% towards penalty for the quarter ended Sept, 2020	The Committee after considering the facts of the case and the company's representation decided to waive the fines levied for non compliance under SEBI (LODR), 2015 for the said Regulation

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- d) The listed entity has taken the following actions to comply with the observation made in previous report:

Sr. No.	Observation of Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended. (the years are to be mentioned)	Actions taken by the listed entity, if any	Comments of Practicing Company Secretary on the actions taken by the listed entity
There were no observation in previous Report				

For Veenit Pal & Associates
Company Secretaries



Veenit Pal
(Proprietor)
M. No. 25565
COP No. 13149

Date: 26.05.2021
Place: Mumbai

UDIN:- A025565C000373341

** Disclaimer Note: During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on the e-verification of scans, soft copies, information, confirmations, records and documents made available to us by the Management.*