

**SECRETARIAL COMPLIANCE REPORT
LIKHAMI CONSULTING LIMITED
FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2022**

I, Veenit Pal, have examined:

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

For the year ended 31.03.2022 in respect of compliance with the provisions of:

- The securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not Applicable to the Company during the Audit period)
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the Company during the Audit period)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Audit period)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company during the Audit period)
- 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)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2018 regarding the Companies Act and dealing with client;
- Securities and Exchange Board of India (Depositories and Participants), Regulations, 2018; and circulars/guidelines issued thereunder;

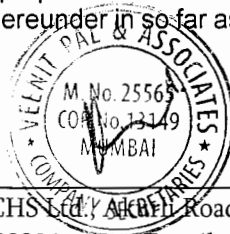
and based on the above examination, I hereby report that, during the review period:

- 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 |
|---------|---|------------|---|
| None | | | |

- 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.

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- 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 |
|---------|-----------------|----------------------|---|--|
| None | | | | |

- 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 |
|---------|---|--|--|--|
| 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. | The Company has paid the fine of Rs. 536900.00 vide cheque no. 327887 dated 24.12.2020. The Company has paid the fine of Rs. 306800.00 vide cheque no. 327888 dated 24.12.2020. | 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). 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. The SEBI accepted Company's application to refund said amount. They adjusted refund amount in company's listing fee, which is due for this year, and remaining amount received in our company's bank account. | The refund is done vide email dated 11.06.2021 |

**For Veenit Pal & Associates
Company Secretaries**


**Veenit Pal
(Proprietor)**



ACS : 25565

CP : 13149

Peer Review No. 1433/2021

UDIN:- A025565D000342156

Date: 18.05.2022

Place: Mumbai