

V.R. ASSOCIATES

Company Secretaries

Resi: G-5/3 Jal Padma, Bangur Nagar, Goregaon West, Mumbai 400 104
Admn office: 31 Topiwala Center, Goregaon West, Mumbai 400 062
Tel: 022-28774306; Mobile 98214 47548; e-mail: cs.ram25@gmail.com
GST No. 27ACSPV8251A1Z7 ; MSME Regn no. UDAYAM-MH-18-0050392

Secretarial compliance report of LKP Securities Limited for the year ended 31st March, 2022

We V.R. Associates have examined:

- (a) all the documents and records made available to us and explanation provided by LKP Securities 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 31st March, 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**
 - (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**
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not Applicable**
 - (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 circulars/ guidelines issued thereunder;

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and based on the above examination, We 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:-
- *LKP Finance Limited (Promoter) had acquired 4.77% of total equity shares in the Company through open market on 9th June, 2021. Further, there was an inter-se transfer (by gift) amongst the Promoters of the Company i.e from Mr. Mahendra V. Doshi to Mr. Pratik M. Doshi for 1.32% of total equity shares on 27th August, 2021, thereby crossing the gross acquisition limit of 5% for a financial year, as provided in the Explanation to Regulation 3(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. Hence in our opinion, the said inter-se transfer need exemption report as required under regulation 10(6) and 10(7) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.*
- (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/our 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:
- (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
1.	Non-compliance with the requirements pertaining to the composition of the Board as per Regulation 17(1) of SEBI (Listing Obligations and	31st March, 2021	The non compliance was made good by appointment of Mr. Mahendra Vasantrai Doshi, as Additional (Non-Independent & Non-Executive)	The company has complied with the said requirement. The waiver of penalty was accepted by BSE Limited vide its e-mail dated 5 th July, 2021 to the

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	Disclosure Requirements) Regulations, 2015.		Director on December 14, 2020. The company had appealed to BSE Limited for waiving of penalty of Rs.10,79,700/-	company.
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For *V.R. Associates*
Company Secretaries

V. Ramachandran
ACS: 7731; CP 4731

Place : Mumbai

Date : May, 25, 2022

UDIN: **A007731D000385658**

Peer Review Certificate no. 1662/2022