

**almondz**  
*the game changer*  
**Almondz Global Securities Ltd.**

Ref:agsl/corres/Bse/Nse/21-22/020

June 29, 2021

**The General Manager  
(Listing & Corporate Relations)  
Bombay Stock Exchange Ltd.  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400001**

**The Listing Department  
National Stock Exchange of India Ltd.  
Exchange Plaza, Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (E), Mumbai – 400051**

**Re: Disclosure of Annual Secretarial Compliance Report for the Year Ended 31<sup>st</sup> March, 2021**

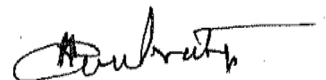
Dear Sir/Madam,

In accordance with Reg. 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company duly certified by the Practicing Company Secretary for the year ended 31<sup>st</sup> March, 2021.

You are requested to kindly take the same on your record

Thanking you,

Yours Faithfully,  
**For Almondz Global Securities Ltd.**



**Ajay Pratap  
Company Secretary &  
Vice President Corporate Affairs**

**Encl:a/a**

SEBI Merchant Banking Registration No. INM000000834



Secretarial Compliance Report of  
**ALMONDZ GLOBAL SECURITIES LIMITED**  
CIN: L74899DL1994PLC059839  
for the year ended 31.03.2021

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

We, Ashu Gupta & Co., Practicing Company Secretaries, New Delhi have examined:

- (a) all the documents and records made available to us and explanation provided by Almondz Global Securities Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity ([www.almondzglobal.com](http://www.almondzglobal.com)),
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued there under 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 ("SEBI (LODR), Regulations 2015");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable during the review 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 during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable during the review period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during the review period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable during the review period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued there under;

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:-

Sr. No	Compliance Requirement	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 44(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	Delayed submission of the voting results for the Court Convened Meeting held on March 03, 2021, after the period prescribed, under Regulation 44(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	The Company had submitted the voting results for the Court Convened Meeting held on March 03, 2021 after the period prescribed under regulation 44(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015

- (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 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:

Sr. No.	Action taken by	Details of violation Under the SEBI (LODR) Regulations, 2015	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	National Stock Exchange of India Ltd (NSE)	Delayed submission of the voting results for the Court Convened Meeting held on March 03, 2021, under Regulation 44(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	NSE vide its e-mail/ letter No.: NSE/LIST-SOP/REG-44/FINES/100859 dated 15.04.2021, issued notice and imposed fine of Rs. 10,000/- on the company	The Company deposited the fine of Rs. 10,000/- with NSE on 27.04.2021
2.	BSE Limited (BSE)	Delayed submission of the voting results for the Court Convened Meeting held on March 03, 2021, under Regulation 44(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	BSE vide e-mail/ letter No.: SOP-CReview-April2021 dated 15.04.2021, issued notice and imposed fine of Rs. 10,000/- on the company	The Company deposited the fine of Rs. 10,000/- with BSE on 28.04.2021

- (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	Observations made in the	Actions taken by the listed entity, if any	Comments of the Practicing
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	Secretary in the previous reports	secretarial compliance report for the year ended 31.03.2020.		Company Secretary on the actions taken by the listed entity
	Not applicable			

- e. The reporting of clause 6(A) and 6(B) of the Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

Place: New Delhi  
Date: 29.06.2021

For Ashu Gupta & Co.  
Company Secretaries

Ashu Gupta  
(Prop.)  
FCS No.: 4123  
CP No.: 6646



UDIN: F004123C000536215

Note: In view of situation emerging due to COVID-19 pandemic and travel restrictions, we could not verify physical records, document and papers etc., therefore we relied on the information provided by the company in electronic mode.