

## **GKV & Associates Company Secretaries**

Gautam K. Virsadiya B.Com, L.L.B., D.T.P., ACS.

## Secretarial Compliance Report of M/s. ECS Biztech Limited for the year ended on 31st March, 2021.

- I, Gautam K. Virsadiya, Practicing Company Secretary have examined:
- a) all the documents and records made available to us and explanation provided by ECS Biztech 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 on 31st 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 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 there under, 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;
- 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 year.

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- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable during the year.
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable during the year.
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable during the year.
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/guidelines issued thereunder.
- i) All other regulations as applicable and circulars/ guidelines issued thereunder; 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:

| No | Compliance (Regulations/ circulars including specific clause) | / guidelines | Observations/ of the Company Secre | Practicing |
|----|---|--------------|------------------------------------|------------|
|    |   | No Observ    |                                    |            |

- 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 there under:

| Sr.<br>No. | Action<br>taken<br>by | Details<br>of<br>violation | Details of action taken E.g. fines, warning letter, debarment, etc. | Observations/ remarks of the Practicing Company Secretary, if any. |
|------------|-----------------------|----------------------------|---|--|
| I          | Oue to not            | n-payment or<br>y and impo | of listing fees stock exchang<br>sed additional penalties for       | ge suspend the trading of the certain non-compliances.             |



d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr.<br>No. | Practicing Company Secretary | Observations made in<br>the secretarial<br>compliance report for<br>the year ended 31st<br>March, 2020 | by the listed entity, if any | Comments of<br>the Practicing<br>Company<br>Secretary on<br>the actions<br>taken by the<br>listed entity |
|------------|------------------------------|--|------------------------------|--|
|            |                              | Nil  |                              |  |

For GKV & Associates

Company Secretaries

Gautam Virsadiya

Proprietor

Membership No-31820, CoP No-19866.

CP No. 19866 Ahmedabad

Place: Ahmedabad Date: 07/06/2021

UDIN- A031820C000428942