



ANNUAL SECRETARIAL COMPLIANCE REPORT

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

OF

PCS TECHNOLOGY LIMITED

FOR THE YEAR ENDED 31st MARCH, 2022

I Kaushal Doshi, Proprietor of M/s. Kaushal Doshi & Associates, Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **PCS Technology 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, reports produced us by the company and information available at the website of Bombay Stock exchange 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) The Securities and Exchange Board of India (Listing Obligation and Disclosure requirement) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the Review Period)**
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buy Back of Securities) Regulations, 1998; **(Not applicable during year under review)**
- e) The Securities and Exchange Board of India (Share based Employees Benefits) Regulation, 2014; **Not applicable during year under review);**



- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during year under review)*;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable during year under review)*;
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992/ SEBI (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Depositories and participant) Regulations, 2018 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder;

based on the above examination, I hereby report that, during the Review Period:

- a) The listed company has complied with the provisions of the above Regulations and circular/ guidelines issued thereunder, except in respect of matters specified below:-

Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	<i>Submission of disclosure of outcome of Board meeting within 30 minutes of the closure of meeting to Stock Exchange as per Regulation 30 of The SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015</i>				
Date of Board Meeting	May 31, 2021	August 05, 2021	November 13, 2021	February 04, 2022	March 14, 2022
Time of Conclusion of meeting	12.30 p.m.	12.10 p.m.	12.01 p.m.	12.44 p.m.	12.40 p.m.
Time of submission of Outcome	1.49 p.m.	1.22 p.m.	03.09 p.m.	1.37 p.m.	05.52 p.m.
Deviation	Delay of 49 Minutes	Delay of 42 Minutes	Delay of 2.38 Hrs	Delay of 23 Minutes	Delay of 4.42 Hrs
Observation/remarks of Practicing Company Secretary	<i>The Management of the Company explained that the delay in submission was inadvertent.</i>				

- 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:

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.
Nil	Nil	Nil	Nil	Nil



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 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Nil	Nil	Nil	Nil	Nil

For Kaushal Doshi & Associates,
Practising Company Secretaries



KD

Kaushal Doshi
Proprietor
FCS:- F10609
COP No: 13143

UDIN: F010609D000346472

Date: 19.05.2022

Place: Mumbai