Lakshmmi Subramanian & Associates

LAKSHMMI SUBRAMANIAN, B.Com., FCS
S. SWETHA, B.Com., FCS
Practising Company Secretaries

Secretarial compliance report of M/S Twentyfirst Century Shares and Securities Limited for the year ended 31st March, 2024

We, Lakshmi Subramanian and Associates, have examined all the documents and records made available to us and explanation provided by M/s Twentyfirst Century Shares and Securities Limited ("the unlisted entity"),

- (i) the filings/ submissions made by the listed entity to the stock exchanges, (Not Applicable)
- (ii) website of the unlisted entity,
- (iii) annual returns filed with the Ministry of Corporate Affairs, which has been relied upon to make this certification,
- (iv) Any other documents, as may be relevant, which has been relied upon to make this certification

for the year ended 31st March, 2024 ("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 (Depositories and Participants) Regulations, 2018;

Based on the above examination, we hereby report that, during the Review Period:

The unlisted material subsidiary has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -



S. N o	Compliance Requiremen t (Regulations / Circulars / guidelines including specific clause)	Regul ation/ Circul ar No	Dev iati ons	Act ion tak en by	Ty pe of Act ion	Deta ils of viol atio n	Fin e amo unt	Observa tions / Remark s of Practici ng Compan y Secretar ies	Man agem ent Resp onse	Re ma rks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

(b)The unlisted entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.

(c)The following are the details of actions taken against the unlisted 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

S. N o	Compliance Requiremen t (Regulations / Circulars / guidelines including specific clause)	Regu latio n/Cir cular No	Devi atio ns	Act ion tak en by	Typ e of Acti on	Det ails of viol atio n	Fin e am oun t	Observa tions / Remark s of Practicin g Compan y Secretari	Ma nag em ent Res po nse	Rem arks
	NA	NA	NA	NA	NA	NA	NA	es NA	NA	NA



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

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FOR LAKSHMMI SUBRAMANIAN & ASSOCIATES
PRACTICING COMPANY SECRETARIES

Date: 11-05-2024 Place: CHENNAI

LAKSHMI SUBRAMANIAN

Senior Partner

FCS No. 3534

CP No. 1087

P.R. No: 1670/2022

UDIN: F003534F000351717