Lakshmmi Subramanian & Associates

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

Secretarial Compliance Report of Twenty first Century Shares and Securities Limited for the year ended 31st March, 2022

We, Lakshmi Subramanian and Associates, have examined all the documents and records made available to us and explanation provided by Twentyfirst Century Shares and Securities Limited, being material subsidiary of the listed entity, M/s.Twentyfirst Century Management Services Limited.

- (i) the filings/ submissions made by the listed entity to the stock exchanges- N.A.
- (ii) website of the unlisted entity, N.A.
- (iii) annual returns filed with the Ministry of Corporate Affairs, 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:
- (1) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (2) 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:

(a) 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. No.	Compliance	Deviations	Observations/Remarks of the
	Requirement(Regulations/circula		Practising Company Secretary
	rs/guidelines including specific		
	clause)		
		NII	MAA

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(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.	Action	taken	Details	of	Details of Action taken, eg.,		Observations/Remarks of the		
No.	by		Violation		fines, debarm	warning ent, etc.	letter,	Practising Secretary, if any	Company
NIL									

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

S.	Observations of the	Observations made in	Actions taken	Comments of the Practising				
No.	Practising Company	the secretarial	by the unlisted	Company Secretary on the				
	Secretary in	compliance report for	entity, if any	actions taken by the unlisted				
	previous reports	the previous year		entity				
	No material observation made during the previous year report							

Place: Chennai

Name of the Practising Company Secretary:

Lakshmmi Subramanian

FCS NO:3534

Date:02.05.2022 C.P No 1087

PR No: 1670/2022

UDIN: F003534D000252717