



**SECRETARIAL COMPLIANCE REPORT OF CREATIVE NEWTECH LIMITED.**

**CIN: L52392MH2004PLC148754**

**FOR THE YEAR ENDED MARCH 31, 2022**

**ISSUED UNDER REGULATION 24A OF SEBI (LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

I have examined:

- (a) all the documents and records made available to us and explanation provided by Creative Newtech Limited ("the Listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the Company,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended March 31, 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. 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;
- 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;

During the year under review, the Company has not brought back any of its Securities.

- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to August 12, 2021) and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from August 13, 2021);

During the year under review, the Company has not issued any shares/ securities to its employee.

- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to August 15, 2021);

During the year under review, the Company has not issued any debt securities.

- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (up to August 15, 2021) and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from August 16, 2021);

During the year under review, the Company has not issued any Non-Convertible and Redeemable Preference Shares/ any Non-Convertible Securities.

- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

The Company has closed trading window all 4 quarters on time but intimation to Stock exchange about closure of trading window of first 3 quarter made post closure of it. As a part of good corporate governance we advised to the Company to make intimation of the closure of trading window to stock exchange before starting of period of closure of Trading Window in future.

- i. Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder;

And based on the above examination, I 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 in so far as it appears from my examination of those records except in respect of matters specified below: -

Sr.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
	-	-	-
	-	-	-

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

- (c) There were no 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 in so far as it appears from my examination or verification of those records except in respect of matters specified below:

Sr .	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
			Date of Penalty imposed	Penalty imposed by BSE (Rs.)	Penalty imposed by NSE (Rs.)	
-	-	-				-

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

Sr .	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	<i>Delay in submission/ Intimation under 27(2), 33(3), 23(9), 7(3), 13(3) of SEBI (LODR) Regulation, 2015 and Regulation 30(2), 31(4), 31(5) of SEBI (SAST) Regulation, 2011.</i>	<b>31/03/2021</b>	<i>The Company has complied these Regulation 27(2), 33(3), 23(9), 7(3), 13(3) of SEBI (LODR) Regulation, 2015 and Regulation 30(2), 31(4), 31(5) of SEBI (SAST) Regulation, 2011 with marginal delay.</i>	<i>The Company has complied these regulation with marginal delay.</i>

**For Satyajit Mishra & Co.  
Company Secretaries**

**Satyajit Mishra  
FCS: 5759  
C P No.: 4997  
PR No. 1769/2022  
UDIN: F005759D000417643**

**Place: Mumbai  
Date: May 28, 2022**