



Richa Dhamija and Company

Company Secretary

C-553, Sector-19, Noida-201301

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Secretarial compliance report of Svam Software Limited for the year ended 31st March, 2022

To,
The Members of,
Svam Software Limited,
224, G/F Swayam Sewa,
Co-Operative Housing Society Ltd.,
Jhilmil Delhi - 110032

I, Richa Dhamija, a Practicing Company Secretary, holding Certificate of Practice No. 12099, have examined:

(a) All the documents and records made available to us and explanation provided by **Svam Software Limited (L65100DL1992PLC047327)** ("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 31.03.2022 ("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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

- f) Securities and Exchange Board of India (Issue and Listing of Municipal Debt Securities) Regulations, 2015;
- g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder from time to time;

And based on the above examination, I/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,
- 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 my/our examination of those records.
- c) No action/(s) 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;
- d) There are no observations made in previous reports.
- e) There being no observations in the Annual Secretarial Compliance Report for the previous year, reporting on actions to comply with its observations do not arise.

For M/s Richa Dhamija and Company
Company Secretary



Date: 16.05.2022
Place: Noida

CS Richa Dhamija
Reg. No. F9776
CP No. 12099

UDIN: F009776D000325960