

SEC/IN/NSE/BSE06/2021
29th June, 2021

The Manager – Listing
National Stock Exchange of India Ltd
Exchange Plaza
Bandra Kurla Complex
Bandra (E)
MUMBAI – 400 051

The Manager - Listing
Bombay Stock Exchange Ltd
Regd. Office : Floor 25
P J Towers, Dalal Street
MUMBAI – 400 001

STOCK CODE: ICDSLTD

SECURITY CODE: 511194

Dear Sir,

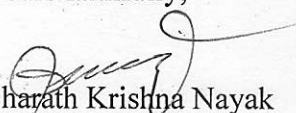
Sub : Annual Secretarial Compliance Report in terms of SEBI
Circular CIR/CFD/CMD1/27/2019 dt.8th February, 2019 &
Regulation 24A of SEBI(LODR) Regulations, 2015.

Dear Sir,

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019
& Regulation 24A of SEBI (LODR) Regulations, 2015, please find enclosed
herewith the Annual Secretarial Compliance Report for the year ended 31st
March, 2021.

Kindly take the above for your records and oblige.

Thanking You,
Yours faithfully,


Bharath Krishna Nayak
Managing Director.
(DIN 00776729)





CS. Shrinivas M Devadiga

COMPANY SECRETARY

Bangalore

ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/S ICDS LIMITED FOR THE YEAR ENDING 31ST MARCH 2021

I, **SHRINIVAS MUTTA DEVADIGA**, Practicing Company Secretary, have examined:

- a) All the documents and records made available to us and explanation provided by ICDS limited ("the listed entity")
- b) The filings/submissions made by the ICDS limited to the BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). (However, shares are presently suspended for Trading. Company already filed revocation application in both stock exchanges, which is in advanced stage)
- c) The website of the listed entity (www.icdslimited.com)
- d) Any other document/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31st march 2021 in respect of compliance with the provisions of:

- a) The **Securities and Exchange Board of India Act, 1992** and the regulations, circulars, guidelines issued thereunder;
- b) The **Securities Contracts (Regulations) Act, 1956**, rules made thereunder and the Regulations, Circulars, guidelines issued thereunder by the Securities and Exchange Board of India;

The specific Regulations whose provisions and the circulars/guidelines issued thereunder have been examined include:

- a. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- d. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the companies act and dealing with clients.



No.105 Munireddy Building, Gear International School Road, Karmelaram Post, Doddakannelli,
Near Sarjapur Road Wipro, Bangalore-560035

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Bangalore

Mumbai



CS. Shrinivas M Devadiga

COMPANY SECRETARY

Bangalore

- e. The Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018
- f. Securities Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
- g. Securities Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
including Modifications/ Amendments from time to time.

And based on 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, except in respect of matters specified below:

Sl. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Nil	Nil	Nil

- b) ICDS 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 Company/ 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 Act Regulations/and circulars/guidelines issued thereunder:

Sl. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter,	Observations/ remarks of the Practicing Company Secretary, if
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COMPANY SECRETARY

Bangalore

debarment, etc. any.

1. Nil Nil Nil Nil

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

Sl. No.	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.	NA	NA	NA	NA

Signature :

Name

: CS Shrinivas M. Devadiga

Membership No.: 22381

COP No.

: 10372

UDIN

: A022381C000529888

Place: Bangalore

Date: 24-06-2021

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