Starteck Finance Limited

SFL/BSE/07/22-23

Date: 20th May, 2022

National Stock Exchange of India Ltd Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai- 400 051 Symbol: STARTECK Phiroze Jeejeebhoy Tower, Dalal Street, Mumbai – 400 001 Scrip Code: 512381

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2022.

Dear Sir/Madam,

Pursuant to the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we hereby submit the Annual Secretarial Compliance Report for the financial year ended March 31, 2022.

Kindly take the same on record.

Thanking You,

For Starteck Finance Limited

Mayuri Jain

Company Secretary

Encl: a/a

Veeraraghavan .N

Practising Company Secretary

11-H-304, Neelam Nagar, Phase-2 Mulund East, Mumbai - 400081 Mob: 9821528844

Email: nvr54@rediffmail.com

Annual Secretarial Compliance Report of Starteck Finance Limited (CIN: L51900MH1985PLC037039) for the year ended March 31, 2022

I, Veeraraghavan N. has examined:

- (a) all the documents and records made available to me and explanation provided by Starteck Finance Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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 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:

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NARAYANAN Date: 2022.05.20

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014and 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 Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and Clauses 6(A) and 6(8) of the Circular No. CIR/CFD/CMDI/114/2019 dated 18 October, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries"

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.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of 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:

Sr.	Action	Details	of	Details	of	Observations/			
No.	taken by	violation		action	taken	remarks of the			
				E.g.	fines,	Practicing			
				warning	letter,	Company Secretary,			
				debarmer	it, etc.	if any.			
Nil									

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

Sr.	Observations of	Observations	Actions taken	Comments of the
No.	the Practicing Company Secretary in the	made in the secretarial compliance	by the listed entity, if any	Practicing Company Secretary on the
	previous reports	report for the year ended March 31, 2022		actions taken by the listed entity
1	Nil	Nil	NA	NA

Signature:

VEERARAGH Digitally signed by VEERARAGHAVAN AVAN NARAYANAN Date: 2022.05.20 15:07:59 +05'30'

Veeraraghavan N. ACS No. 6911 C.P.No.4334

UDIN: A006911D000354115

Date: 20th May, 2022