



**Secretarial Compliance Report of ASM Technologies Limited
for the year ended 31st March 2022**

To,
The Board of Directors,
ASM Technologies Limited
CIN: L85110KA1992PLC013421
80/2, Lusanne Court, Richmond Road,
Bangalore - 560025

We, **BMP & Co. LLP, Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **ASM Technologies Limited** ("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 31st March 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:-



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- (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:- Not Applicable as the Company did not buyback any of its securities during the financial year under review;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:- Not applicable as the Company did not issue any Employee Stock Option Scheme for its employees;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021:- Not applicable as the Company has not issued any debt securities during the financial year under review;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013:- Not Applicable as Company has not issued Preference shares during the year under review;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993:- Not applicable as the Company is not registered as Registrar to an Issue and Share Transfer Agent during the financial year under review and
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021:- Not applicable as the Company has not delisted its equity shares from any stock exchange during the financial year under review;

and based on the above examination, 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, except in respect of matters specified below:-



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

- (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 our 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. No.	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.
NIL				

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

Sr. No.	Observations of the Practicing Company	Observations made in the secretarial compliance report	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the
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	Secretary in the previous reports	for the year ended 31 st March, 2021 (The years are to be mentioned)		actions taken by the listed entity
1.	Not Applicable	The Company was required to complete the bonus issue within the time stipulated under Regulation 295(1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations 2018. There was a delay thereby leading to non-compliance of Regulation 295(1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations 2018.	The Company completed the Bonus issue with a delay of 3 days and paid Rs. 60,000 fine levied by Bombay Stock Exchange (BSE).	The delay was inadvertent, and the company had made best efforts towards meeting timelines. The company has assured to meet the prescribed timelines in future and remain in compliance with all applicable provisions of the SEBI Rules and Regulations



For **BMP & Co. LLP**,
Company Secretaries



A handwritten signature in blue ink, appearing to be "Pramod S M".

Pramod S M

Designated Partner

Place: Bangalore

Date: 30-May-2022

Membership No.: F7834, CP No: 13784

UDIN: F007834D000434128