



LINAKS MICRO ELECTRONICS LIMITED  
Regd.Off: 12.6 km Barabanki Road,  
Chinhat, Lucknow-227105.  
Phone: 0522-6549493 Fax: 0522-2622061  
Email: [linakspcb@yahoo.com](mailto:linakspcb@yahoo.com)  
**CIN: L32101UP1986PLC007841**

The Listing Manager,  
The Stock Exchange, Mumbai,  
Phiroze Jeejeebhoy Towers,  
Fort, Dalal Street,  
MUMBAI-400 001

26.05.2023

**Sub: Uploading of Revised Secretarial compliance report of the Company as per new format prescribed for the year ended 31<sup>st</sup> March, 2023 - Reg. 24(A) of SEBI (LODR) Regulations, 2015**

Sir,

Please find attached revised Secretarial compliance report of the Company as per new format prescribed for the year ended 31<sup>st</sup> March, 2023 issued by M/s Divya Matah & Associates, Practicing Company Secretaries under Reg. 24(A) of SEBI (LODR) Regulations, 2015.

Thanking you,

Yours faithfully,  
**For Linaks Micro Electronics Limited**

**ANIL KUMAR SINGH**  
**Managing Director**  
**DIN : 00225518**



**DIVYA MATAH & ASSOCIATES**  
**Practicing Company Secretaries**

49 Vijay Nagar, Kanpur Road, Lucknow-226 023

Mobile : 9454118040

E-mail:divya.matah@gmail.com

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**Secretarial compliance report of LINAKS MICRO ELECTRONICS LIMITED**  
**for the year ended 31<sup>st</sup> March, 2023**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Linaks Micro Electronics Limited** (The Company),
- (b) the filings/ submissions made by the company 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 **31.03.2023** 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; **(Not applicable to the company during the Review Period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the company during the Review Period)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the company during the Review Period)**

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the Review Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the company during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(Not applicable to the company during the Review Period)**

and circulars/ guidelines issued there under;

We hereby report that during the Review Period the compliance status of the Listed Entity is appended as below:

| Sr. No. | Particulars   | Compliance Status (Yes/No/NA) | Observations/ Remarks |
|---------|---|-------------------------------|-----------------------|
| 1.      | Secretarial Standards:<br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.   | Yes                           | Not applicable        |
| 2.      | Adoption and timely updation of the Policies: <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations /circulars/guidelines issued by SEBI</li> </ul> | Yes                           | Not applicable        |

|    |   |      |   |
|----|---|------|---|
| 3. | <p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website.</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</li> </ul> | Yes  | Not applicable                          |
| 4. | <p>Disqualification of Director:<br/>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>  | Yes  | Not applicable                          |
| 5. | <p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>   | N.A. | There is No subsidiary of the company   |
| 6. | <p>Preservation of Documents:<br/>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>   | Yes  | Not applicable                          |
| 7. | <p>Performance Evaluation:<br/>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>  | Yes  | Not applicable                          |
| 8. | <p>Related Party Transactions:<br/>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed</p>   | N.A. | No transaction during the Review period |

|     |  |      |                |
|-----|--|------|----------------|
|     | entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.  |      |                |
| 9.  | Disclosure of events or information:<br>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.   | Yes  | Not applicable |
| 10. | Prohibition of Insider Trading:<br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.   | Yes  | Not applicable |
| 11. | Actions taken by SEBI or Stock Exchange(s), if any:<br>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**). | N.A. | No action      |
| 12. | Additional Non-compliances, if any:<br>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.   | N.A. | None           |

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/ circular s/ guide-lines includin g specific clause) | Regulation/ Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|
|         |  |                          |            | NIL             |                |                      |             |   |                     |         |

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

| Sr No . | Compliance Requirement (Regulations/ circular s/ guide-lines includin g specific clause) | Regulation/ Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|
|         |  |                          |            | Not applicable  |                |                      |             |   |                     |         |

The Company is Under Corporate Insolvency Resolution Process.

**Divya Matah & Associates**  
**Company Secretaries**

**Divya Matah**

**M No. – 9630, C.P. - 11719**

Date: 26.05.2023

Place: Lucknow

UDIN: F009630E000393959