



**SECRETARIAL COMPLIANCE REPORT OF DATA PATTERNS (INDIA) LIMITED
FOR THE YEAR ENDED 31-03-2022**

I have examined:

- (a) all the documents and records made available to us and explanation provided by Data Patterns (India) 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 31-03-2022 ("Review Period") in respect of compliance with the provisions of:

- (i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (ii) 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 (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;

- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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, except in respect of matters specified below:-

S. No.	Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	Regulation 30(6) of SEBI LODR read along with Schedule III Point 7- Change in directors shall be disclosed to the stock exchange within 24 hours of the event.	Mr. Vijay Ananth was appointed as the Additional Director of the Company in its Board Meeting held on 08.02.2022. However, intimation of his appointment has not been made to BSE and NSE within 24 hours of the event.	As per the reply given by the Company's management, the appointment of Mr. Vijay Ananth has been communicated to the stock exchanges vide the Corporate Governance Report filed for the quarter ended 31 st march 2022. Also, appointment of Mr. Vijay Ananth has been regularized as the Executive Director of the Company by the shareholders in the EGM held on 06.05.2022 and has disclosed the same in the Intimation of EGM proceedings.

It is noted that the Company is yet to comply with the performance evaluation of Independent Directors since one year has not passed after their appointment. The fact is disclosed to the stock exchange in the Corporate Governance report for the quarter 31.03.2022.

It is noted that Mr. Mathew Cyriac was appointed as Non-Executive Director and has been disclosed with the stock exchanges as Non-Executive Director in the previous quarter (December 2021). However, in the Composition of Board of Directors, Membership of Nomination and Remuneration Committee and Chairmanship of Stakeholder Relationship Committee, his designation is stated by mistake as an Executive Director. As per the reply given by the Company's management, this is a clerical error for which a revised Corporate Governance report has been submitted and that the Company has provided clarifications regarding this to both BSE and NSE.

- (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:

S. No.	Actions taken by	Details of Violation	Details of action taken	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:

S. 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
NOT APPLICABLE				

For Mohan Kumar & Associates



A. Mohan Kumar
Practicing Company Secretary
Membership Number: FCS4347
Certificate of Practice Number: 19145
UDIN: F004347D000409389

Place: Chennai
Date: 27.05.2022