



SPECTRUM TALENT MANAGEMENT LTD.
(Formerly known as Spectrum Talent Management Private Limited)

Date: 05/08/2026

SYMBOL: SPECTSTM
ISIN: INE00L001018

To
The Listing Department,
National Stock Exchange of India Ltd,
Exchange Plaza,
Bandra Kurla Complex, Bandra (East),
Mumbai- 400051

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March 2026 (2025-26)

Dear Sir/Madam,

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Master Circular No. HO/49/14/14(7)2025-CFDPOD2/1/3762/2026 dated January 30, 2026 and other relevant circulars, please find enclosed the Annual Secretarial Compliance Report for the financial year ended March 31, 2026, issued by M/s Vijay K. Singhal & Associates, Company Secretaries.

Kindly take the above information on your record.

Thanking you,

For Spectrum Talent Management Limited

Alok
Pandey
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Alok Pandey
Date: 2026.08.05
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(Alok Pandey)
Company Secretary and Compliance Officer
M. No.: A50276

Encl. As above

PAN NO-AARCS4776M, CIN NO-L51100DL2012PLC235573

Registered Office
B-46, RETREAT APARTMENTS, 20, I.P. EXTENSION,
DELHI-110092

Corporate Office
C-151, SECTOR 63, NOIDA 201301
HELPDESK-7065060428

VISIT US: WWW.STMPL.CO.IN, WWW.CONSULTSTM.COM



VIJAY K. SINGHAL & ASSOCIATES

COMPANY SECRETARIES

Off: 2nd Floor, Plot No 6, Priya Enclave, Near Karkardooma Court, Delhi - 110092
Mob: - 9899722766, 8178992793 E-mail Id: pcsvijaysinghal1@gmail.com

To,
Spectrum Talent Management Limited
B-46, Retreat Apartments, 20 I P Extension,
East Delhi, Delhi, India, 110092

Subject: Annual Secretarial Compliance Report for the Financial Year ended 2025-26

Dear Sir,

I have been engaged by **Spectrum Talent Management Limited**, (hereinafter referred to as the "**Company**") bearing CIN: L51100DL2012PLC235573 whose equity shares are listed on National Stock Exchange of India Limited ("NSE") (SME Platform) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time read with SEBI's Master Circular No. SEBI/HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 and relevant circulars issued by the Securities and Exchange Board of India ("SEBI") from time to time and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and Circulars/Guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the company with provisions of all applicable SEBI Regulations and Circulars / Guidelines issued from time to time and issue a report thereon. My audit was conducted in accordance with the Guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

The Annual Secretarial Compliance Report for the FY 2025-26 is enclosed.

For Vijay K. Singhal & Associates

Company Secretaries

Firm Registration No. S2013DE223300

Peer Review Certificate No. 8107/2026

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SINGHAL

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Vijay K. Singhal

Proprietor

(M. No.: F- 13221)

(CP No.: 10385)

UDIN: F013221H001018852

Date: 04.08.2026

Place: Delhi

ANNUAL SECRETARIAL COMPLIANCE REPORT
Secretarial Compliance Report of Spectrum Talent Management Limited (CIN
L51100DL2012PLC235573) for the financial year ended 31st March, 2026

I have examined:

- a) all the documents and records made available to us and explanation provided by Spectrum Talent Management 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 Report for the financial year ended 31st March, 2026 ("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 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 ("SEBI LODR Regulation");
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI ICDR Regulation");
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI SAST Regulation");
- 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 and Sweat Equity) Regulations, 2021; **[Not Applicable to the Company during the Review period]**
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **[Not Applicable to the Company during the Review period]**
- g. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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h. Securities and Exchange Board of India (Depositories and Participants) Regulations,

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, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary (PCS)	Response Remarks
Nil									

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports	Observations made in the Secretarial Compliance report for the year ended ... (The years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity
Not Applicable					

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I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No	Particulars	Compliance Status (Yes/ No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	--
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI.	Yes	--
3.	Maintenance and disclosures on Website: • The listed entity is maintaining a functional website. • Timely dissemination of the documents/ information under a separate section on the website. • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.	Yes Yes NA	--
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	--
5.	Details related to subsidiaries of listed entities have been examined w.r.t.:	NA	The listed entity does not have

	(a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	Yes	any material subsidiary. The Company has disclosed the details of other subsidiaries.
6.	Preservation of Documents: 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.	Yes	--
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	--
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes NA	-- --
9.	Disclosure of events or information: 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	--
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	--

11.	The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	No Action has been taken either by SEBI or by Stock Exchanges.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	No such event take place during the review period
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	No additional non compliances observed.

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. **Not Applicable**

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed

entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Delhi

Date: 04.08.2026

Signature: VIJAY KUMAR SINGHAL

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KUMAR SINGHAL
Date: 2026.08.04 19:49:00
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Name of the PCS: Vijay K. Singhal

FCS No.: 13221

CP No. : 10385

UDIN : F013221H001018852

Peer Review No. 8107/2026
