

# LUCENT INDUSTRIES LIMITED

(Formerly Known as SYLPH EDUCATION SOLUTIONS LIMITED)

Regd. Off: Second Floor, 448-D, Scheme No.51,  
Sangam Nagar, Indore, (M.P.)-452006  
E-mail: sylphedu@gmail.com; mhfl@bsnl.in;  
info@sylphedu.com URL: www.sylphedu.ltd  
CIN: L80302MP2010PLC023011

**Date:13.05.2022**

To,  
Department of Corporate Services  
**BSE Limited,**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2021-22**

In compliance with **SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019**, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2022 issued by secretarial auditor Ms. Geeta Serwani Practising Company Secretaries. You are requested to take the same on your record.

Thanking you,

**Yours Faithfully,**  
**For, LUNCENT INDUSTRIES LIMITED**

**For, Lucent Industries Limited**

**Director/Authorised Signatory**

**Director/Authorised Signatory**



## ANNUAL SECRETARIAL COMPLIANCE REPORT

*Secretarial compliance report of Lucent Industries Limited (Formerly known as Sylph Education Solutions Limited.) For the year ended 31<sup>st</sup> March, 2022.*

I have examined:

- (a) all the documents and records made available to me and explanation provided by **M/s. LUNCENT INDUSTRIES LIMITED (Formerly known as SYLPH EDUCATION SOLUTIONS LIMITED**“ the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, [http:// http://www.sylphedu.ltd/](http://www.sylphedu.ltd/)
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended on **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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/guidelines issued there under, 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 during the period under review .**
- (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 during the period under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable during the period under review.**



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the period under review.**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable during the period under review.**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder; 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	SEBI (LODR) Regulations, 2015 – Regulation No. 13 , 22 And 23	Policies for Grievance Redressal Mechanism, Vigil mechanism and Related party transaction are not framed.	The Company advised to make necessary policies immediately as per the regulation 13, 22 and 23.
2	SEBI (LODR) Regulations, 2015 – Regulation No. 30 and 47.	The listed entity shall publish the information in the newspaper	Necessary newspaper advertisements were not published during the period under review as per regulation 30 and 47.
3	SEBI (LODR) Regulations, 2015 – Regulation No. 23, 30 and 46	The listed entity should maintain a functional website containing the required details as specified in the SEBI (LODR) Regulations, 2015 are not available on website of the company	Some information's as per SEBI (LODR) Regulation 2015 are not available/ updated on website of the company.
4.	SEBI (LODR) Regulations, 2015 - corporate governance provisions	Acknowledgement for sending the notices of the Meeting of the Board, General and Committees meetings are not maintained by the company.  Minutes and Attendance Registers of the Board meeting and General Meeting for the period under review were not available to check.	Notices, Attendance Registers and Minutes book of General meetings, Board meetings and various committee meetings were not available to check/review.

(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. 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.
<b>NIL</b>				

(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 Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2020	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
1.	SEBI (LODR) Regulations, 2015 – Regulation No. 13 , 22 And 23	Policies for Grievance Redressal Mechanism, Vigil mechanism and Related party transaction are not framed.	Not Any	Not Applicable
2.	SEBI (LODR) Regulations, 2015 – Regulation No. 30 and 47.	The listed entity shall publish the information in the newspaper	Not Any	Not Applicable
3.	SEBI (LODR) Regulations, 2015 – Regulation No. 23, 30 and 46	The listed entity should maintain a functional website containing the required details as specified in the	Not Any	Not Applicable



		SEBI (LODR) Regulations, 2015 are not available on website of the company		
4	SEBI (LODR) Regulations, 2015 - corporate governance provisions	Acknowledgement for sending the notices of the Meeting of the Board, General and Committees meetings are not maintained by the company.  Minutes and Attendance Registers of the Board meeting and General Meeting for the period under review were not available to check.	Not Any	Not Applicable

**Note :**

- (a) In period under review financial year 2021-22 the listed entity has applied for name change from Sylph Education Solutions Limited to Lucent Industries Limited and got the approval from BSE on 18.04.2022.

**For, GEETA SERWANI & ASSOCIATES**  
**Practicing Company Secretary**



**Cs Geeta Serwani**  
**Proprietor**  
**C. P. No.: 8842**  
**Membership No. 8991**

**Place: Secunderabad**  
**Date: 11.05.2022**  
**UDIN: F008991D000305155**