



Date: 15.06.2020

To

The Manager
Listing Department
BSE Limited
P J Towers, Dalal Street
Mumbai – 400001

Scrip Code 539400.

Dear Sir/Madam,

Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2020

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are forwarding herewith the Annual Secretarial Compliance Report for the financial year 2019-20.

You are requested to kindly take the above information on record.

Thanking you,

For Mallcom (India) Limited

A handwritten signature in blue ink, reading "Shuvanki Purakayastha".

**Shuvanki Purakayastha
Company Secretary**



SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED 31ST MARCH, 2020

[Pursuant to the Regulation 2A of the SEBI (LODR) Regulations, 2015]

To
The Members
Mallcom (India) Limited

I, CS Rakhi Dasgupta, Proprietor M/s. Rakhi Dasgupta & Associates, Company Secretaries in Practice (FRN: S2019WB692200) have examined:

- (a) all the documents and records made available to us and explanation provided by Mallcom (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 31st March, 2020 ("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"); **NOT APPLICABLE**

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**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **NOT APPLICABLE**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **NOT APPLICABLE**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **NOT APPLICABLE**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **NOT APPLICABLE**

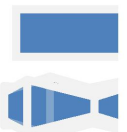


Membership No.: A28739; CP No.: 20354

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Address: 218, Paschim Daspara, Nischintapur Road,
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RAKHI DASGUPTA & ASSOCIATES

(COMPANY SECRETARIES IN PRACTICE FRN-S2019WB692200)

- (g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013; **NOT APPLICABLE**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Any other regulations as applicable and circulars/ guidelines issued thereunder;

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
NONE			

- (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/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.
NONE				

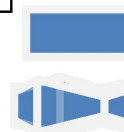


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(COMPANY SECRETARIES IN PRACTICE FRN-S2019WB692200)

(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 31/03/2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

Place: Kolkata
Date: 15/06/2020



Signature: 
Name of Company Secretary in practice:
CS Rakhi Dasgupta
Proprietor: M/s. Rakhi Dasgupta & Associates
Firm: S2019WB692200
ACS No. 28739
CP No.: 20354
UDIN: **A028739B000342965**

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