

4<sup>th</sup> June, 2020

PCL/CS/15689

The Secretary  
The Bombay Stock Exchange Ltd.,  
25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

**Sub: Regulation 24 A read with SEBI Circular No:CIR/CFD/CMD1/27/2019 dated 08.02.2019 regarding Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020**

Dear Sir,

In compliance with the Regulation 24 A read with SEBI Circular No:CIR/CFD/CMD1/27/2019 dated 08.02.2019, please find enclosed Annual Secretarial Compliance Report issued by Mr. Vishal Arora (Practicing Company Secretary) for the year ended 31<sup>st</sup> March, 2020.

This is for your information and records please.

Thanking you.

Yours faithfully,  
For Punjab Communications Limited

  
Company Secretary

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Secretarial Compliance report of Punjab Communications Limited

For the year ended 31.03.2020

To,

**Punjab Communications Limited**

B-91, Phase-VIII, Indl. Area,

S.A.S Nagar (Punjab)

I have examined:

- (a) all the documents and records made available to us and explanation provided by Punjab Communications 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”);

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 Audit Period)**
- (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 Audit Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to the Company during the Audit Period)**



# VISHAL ARORA

B.COM. F.C.S., M.F.C. PGDIPR

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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not Applicable to the Company during the Audit Period**)
- (g) Securities and Exchange Board of India (Issue and Listing of NonConvertible and Redeemable Preference Shares) Regulations, 2013 (**Not Applicable to the Company during the Audit Period**)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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,
- (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) There are no 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.



Vishal Arora, FCS  
FCS No. 4566, CP No. 3645

Place: Chandigarh

Date: 04.06.2020

UDIN: **F004566B000315745**