



ObjectOne Information Systems Ltd.

27th May, 2024

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001

Dear Sir/Madam,

Ref: Scrip Code – 535657; ISIN No: INE860E01011, Objectone Information Systems Limited

Sub: Annual Secretarial Compliance Report for the year ended 31.03.2024 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Clause 3(b)(iii) of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2024, issued by Mr. Manish Kumar Singhania, Practicing Company Secretary.

This is for the information and records of the Exchange, please.

Thanking you.

Yours sincerely,
For ObjectOne Information Systems Limited



Ravi Shankar Kantamneni
Managing Director
DIN: 00272407
Encl: a/a

SECRETARIAL COMPLIANCE REPORT
OBJECTONE INFORMATION SYSTEMS LIMITED

FOR THE YEAR ENDED 31ST MARCH, 2024

I Manish Kumar Singhania (Practicing Company Secretary) have examined:

- (a) All the documents and records made available to me and explanation provided by Objectone Information Systems 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 2024 ("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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and sweat equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares Securities) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circulars and guidelines issued there under.



I hereby report that, during the Review Period the compliance status of the listed entity is appended below;

Sl No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/Remarks by PCS
1	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	
2	<u>Adoption and timely updation of the Policies:</u> • 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	
3	<u>Maintenance and disclosures on Website:</u> •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 re-directs to the relevant document(s)/ section of the website.	Yes	
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	
5	<u>To examine details related to Subsidiaries of listed entities:</u> (a)Identification of material subsidiary companies (b)Requirements with respect to disclosure of material as well as other subsidiaries	NA	There was sale of material subsidiary named (Stiaos Technologies INC) with the approval of shareholders by means of postal ballot held on 25.04.2023
6	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of	Yes	



	Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8	<u>Related Party Transactions:</u> (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	
9	<u>Disclosure of events or information:</u> 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 there under	Yes	
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided by the paragraph herein(**)	Yes	<p>The company has received penalty from BSE for non-compliance of regulation 33 of SEBI(LODR) Regulation 2015</p> <p>The company has received email dated 06 April 2024 regarding seeking explanation for non-mentioning of AGM Concluding time in the "Proceedings of Annual General Meeting Dt. 30.09.2023"</p> <p>3.Delay in submission of outcome of board meeting.</p>



12	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	YES	Trading window closure for the 1 st quarter was not intimated to stock exchange within the time.
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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	Compliances with the following conditions while appointing/re-appointing an auditor i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year	NA	As no auditor has resigned from the company
2	Other conditions relating to resignation of statutory auditor i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to	NA	As no auditor has resigned from the company



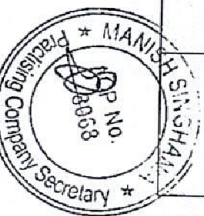
	<p>the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3	<p>The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.</p>	NA	As no auditor has resigned from the company

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*



(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 No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 33 of SEBI(LODR) Regulation 2015-Financial result	Reg-33	Fine levied for Non-compliance of Reg-33	BSE	BSE has imposed fine on the company	Non submission of financial result with in the period prescribed under regulation 33 of SEBI(LODR) 2015 for which BSE has levied the penalty.	17,700	The company has received a notice from BSE for not complying with the regulation 33 of SEBI (LODR) regulations 2015, which states that company shall submit quarterly and year to date standalone and consolidated if any financial result to the stock exchange within 60 days from the end of last quarter. As the company not submitted financial result for the quarter ended march as required under SEBI (LODR) regulation 2015. BSE has levied penalty of Rs.17,700 with its letter dated 30.06.2023 and paid the penalty on 01.07.2023	Management has submitted to stock exchange, financial result for the march quarter on 02.06.2023	The company has complied with the Regulation 33 of SEBI(LODR) Regulation 2015 and company has paid penalty levied by the BSE.



2	Regulation 9 of SEBI(PIT) Regulation 1992- Trading window closure	Reg -9	Non-compliance of Trading window closure	No action taken by BSE	NA	Trading window closure has not been updated to stock exchange within time	NIL	The company has to upload every end of the quarter "trading restriction period which shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results" to stock exchange And the same has been not intimated by the company for the quarter June 2023 within time	Management has informed that company has intimated to stock exchange regarding the closure of trading window for the June quarter to the BSE on July 06 th 2023	NA
3	Regulation 30 of SEBI(LODR) Regulation 2015-Outcome of the board meeting	Reg -30	Late submission of outcome of board meeting to stock exchange	BSE	BSE has sent a mail to the company for clarification on the late submission of the outcome of board meeting	Non submission of outcome of board meeting with in the period prescribed under regulation 30 of SEBI(LODR) 2015 for BSE has sent a mail for clarification from the company.	NIL	The company has to submit the outcome of the board meeting with in 30minutes of the end the board meeting The outcome of the board meeting held on 2 nd June 2023 has been delayed by 3minutes for which company has provided clarification to the stock exchange	Management has informed that company has given clarification on the outcome of the board meeting- Due to technical glitch company has received several OTPs and there was delay in uploading outcome of the board meeting and stock exchange has noted the same without any further clarification or penalty.	NA



4	Regulation 30 of SEBI(LODR) 2015- Proceedings of the AGM	Reg 30	Non-mentioning of AGM Concluding time in the "Proceedings of Annual Meeting Dt. 30.09.2023"	BSE	BSE has sent a mail to the company for seeking explanati on non-mentioni ng of AGM Concludi ng time in the "Proceed ings of Annual General Meeting Dt. 30.09.20 23"	Non- mentioning of AGM Concluding time in the "Proceedings of Annual Meeting Dt. 30.09.2023 prescribed under regulation 30 of SEBI(LODR) 2015 for which BSE has sent a mail for clarification from the company.	NIL	The company has to mention the conclusion time for proceeding of the AGM	The company has submitted the revised proceeding of the AGM in which conclusion time has been mentioned.	Management has informed that company has stock exchange as a reply by uploading revised proceeding mentioning conclusion of time of AGM on 8 th April 2024	NA
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

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



1	Regulation 23 of SEBI(LODR) Regulation 2015-Related party transaction	Reg 23	Late compliance under Reg.23 (9) for half year ended September 2022	BSE	BSE has imposed fine on the company	Noncompliance with the disclosure of Regulation 23(9) of SEBI(LODR)	1,29,800	The company has received a notice from BSE for not complying with the regulation 23(9) of SEBI (LODR) regulations 2015. Which states that company shall make disclosures to BSE every six months within fifteen days from the date of publication of its standalone and consolidated financial results. As the company not made disclosure as required under SEBI (LODR) regulation. BSE has levied penalty of Rs 1,29,800 wide its letter dated 27.12.2022 and company has not yet paid the penalty levied	Management has made disclosure to stock exchange letter dated 29.12.2022 under regulation 23 of SEBI(LODR) 2015	The company has complied with the Regulation 23 of SEBI(LODR)regulation 2015.And penalty has been paid by the company on 24.07.2023
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2	Regulation 27 of SEBI(LODR) Regulation 2015- Corporate Governance	Reg-27	Fine levied for Non-compliance of Reg-27	BSE	BSE has imposed fine on the company	Non submission of corporate governance report for the quarter ended September 2022 with in the period prescribed under regulation 27 of SEBI(LODR) 2015 for which BSE has levied the penalty	1,06,200	The company has received a notice from BSE for not complying with the regulation 27 of SEBI (LODR) regulations 2015 which states that company should submit a quarterly compliance report within 21days from the end of the quarter. A) As per the email dated 21.11.2022 BSE has levied a penalty of Rs. 66,080/- B) BSE has levied a penalty of Rs.1,06,200 wide its letter dated 07.12.2022 and frozen the demat account of promoters.	Management has submitted to stock exchange, corporate governance report from the December Quarter 2022	The company has complied with the Regulation 27 of SEBI (LODR) regulation 2015 from December quarter and the company has paid the penalty of Rs. 66,080/- levied by BSE.
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Place: Hyderabad
Date: 24.05.2024

Manish Singhamia
Manish Kumar Singhamia
Practising Company Secretary
ACS No. 22056
C P No: 8068
UDIN: A0220566F000445589

