

**Corporate Office :**

A-60, Naraina Industrial Area, Phase-I,

New Delhi-110 028 INDIA

TEL. : 91-11-41411070 / 71 / 72

E-mail : investors@shyamtelecom.com

Website : www.shyamtelecom.com

**SHYAM**  
TELECOM LTD

Dated - May 26, 2022

The Manager, Department of Corporate Services Bombay Stock Exchange Limited ("BSE") Phiroze Jeejeebhoy Towers Dalal Street, Mumbai - 400001 Security Code - 517411 Through BSE Listing Centre	Listing Department, National Stock Exchange of India Limited ("NSE") Exchange Plaza, Bandra Kurla Complex Bandra (E), Mumbai - 400001 Security Symbol - SHYAMTEL Through NEAPS
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**SUB - ANNUAL SECRETARIAL COMPLIANCE REPORT PURSUANT TO REGULATION 24A OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 AND SEBI CIRCULAR NUMBER - CIR/CFD/CMD1/27/2019 dated February 08, 2019**

Dear Sir/Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the SEBI Circular Number - CIR/CFD/CMD1/27/2019 dated February 08, 2019.

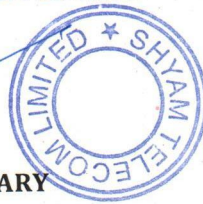
This is for your information / records and circulation to the Members of the Exchange.

Thanking You

Yours Sincerely

For SHYAM TELECOM LIMITED

  
SOURABH BANSAL  
COMPANY SECRETARY



Encl:

1. Secretarial Compliance Report dated May 12, 2022.

Regd. Office : Shyam House, 3, Amrapali Circle, Vaishali Nagar, Jaipur-302021 (RAJASTHAN) INDIA

Phone : 91- 0141- 4919021

CIN : L32202RJ1992PLC017750

**Secretarial Compliance Report of Shyam Telecom Limited for the year ended 31<sup>st</sup> March, 2022 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular No.CIR/CFD/CMD1/2019 dated February 08, 2019.**

To

**The Board of Directors  
Shyam Telecom Limited (CIN: L32202RJ1992PLC017750)  
Corporate Office, New Delhi.**

For purpose of Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015, compliance audit has been conducted in accordance with **Auditing Standards (CSAS-1 to CSAS -4) and Guidance Notes on ICSI Auditing Standards, ICSI Guidance Note on Code of Conduct for Company Secretaries**. We have examined:

- (a) all the documents and records made available to us and explanation provided by Shyam Telecom 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 31<sup>st</sup> March, 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 for Review 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 for the Review Period);



- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity ) Regulations, 2021 ; -- ( Not applicable for the Review Period);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; - (Not applicable for the Review Period);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- (i) SEBI (Depositories and Participants) Regulations, 2018 and circulars/guidelines Issued there under;

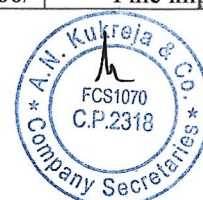
and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, 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
	NIL	NIL	NIL

- (b) The listed entity has maintained proper records under the provisions of above Regulations and circulars/ guidelines issued there under insofar as it appears from 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 there under:

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
1	BSE & NSE	Non- submission of financial results within prescribed period under regulation 33 of SEBI (LODR) Regulations, 2015, to BSE and NSE.	Total fine of Rs. 17700/- including Taxes levied by BSE and NSE separately.	Fine imposed as per standard operating procedure. Company has paid the fines to both BSE and NSE.
2	BSE & NSE	Non- submission of annual report within prescribed period under regulation 34 of SEBI(LODR) Regulations 2015, to BSE and NSE.	Total fine of Rs. 4720/- including Taxes levied by BSE and NSE separately.	Fine imposed as per standard operating procedure of SEBI. Company has paid fines to both BSE and NSE.
3	BSE and NSE	Non- submission of	Total fine of Rs.5900/-	Fine imposed



		disclosures on related party transactions under regulation 23(9) of SEBI (LODR) Regulations, 2015 to BSE and NSE.	including taxes levied by BSE and NSE separately.	as per standard operating procedure of SEBI. Company has paid the fine.
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- (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 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA	NA	NA	NA

For A.N.Kukreja & Co.  
Company Secretaries

*A.N. Kukreja*

(A.N.Kukreja)

Proprietor: FCS1070/C.P.2318

ICSI Unique Code S1995D014900

Peer Review Cert 875/2020

UDIN: F001070D000309059



Place; New Delhi  
Date: 12 May, 2022.