



Neueon Towers Limited

(Formerly known as Sujana Towers Limited)

Date: 27th September, 2021

To

The Department of Corporate Services – CRD, BSE Limited, P.J.Towers, Dalal Street, MUMBAI – 400 001 Scrip Code: 532887	National Stock Exchange of India Ltd, 5 th Floor, Exchange Plaza, Bandra (E), MUMBAI – 400 051 Scrip Symbol: NTL
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Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31st March 2021– Reg
Ref: Regulation 24 (a) of the Listing Regulations, 2015**

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Kindly take the above information on record.

Thanking You,

Yours faithfully,

For Neueon Towers Limited

P Apser Hussien

Company Secretary

(A Company under Corporate Insolvency Resolution Process by NCLT order No. CP(IB)No. 679/07/HDB/2018)

CIN: L40109TG2006PLC049743
Regd. Office:
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Turkula Khanapur(V),
Hatnur (M), Medak Dist. - 502 201.
Telangana, India.
T + 91-08458-288964/965.
www.neueontowers.com

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Telangana, India.
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F +91-40-23815534.

**Secretarial Compliance Report under Regulation 24A of SEBI (LODR)
Regulations, 2015 of Neueon Towers Limited for the year ended March 31, 2021**

I Vendra Madhumita, Practising Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Neueon Towers Limited [CIN: L40109TG2006PLC049743] (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 March 31, 2021 (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, includes:-

- (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 - not applicable during the period under review;

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Panjagutta, Hyderabad- 500082**

**kvmmandassociates@gmail.com
+91 9110301639/ 8639929546**

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 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 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:

S 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.	SEBI	Regulation 13(3)- Investor Grievance Report	fine	No information has been provided by the management about the nature of default, therefore we cannot comment on this
2.	SEBI	Regulation 31 -Share holding pattern	fine	The share holding pattern has to be submitted to SEBI in the prescribed manner and time
3.	SEBI	Regulation 76- Reconciliation of share capital audit report	fine	No information has been provided by the management about the nature of default, therefore we cannot comment on this
4.	SEBI	Regulation 20(2)- Composition of stakeholder's relationship committee	fine	The composition has to be as per Regulation 20(2)
5.	SEBI	Regulation 27(2)- Corporate Governance Report	fine	No information has been provided by the management about the nature of default, therefore we cannot comment on this
6.	SEBI	Regulation 33 -Financial report	fine	The financial reports have to be submitted to SEBI in the prescribed format and in time.
7.	SEBI	Regulation 29(2)/ (3) Prior intimation of board meeting	fine	The company needs to have a proper mechanism for timely intimation about the board meetings of the company

*All the above non- compliances are of three consecutives financial year 2018- 19,2019-20, 2020-21

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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1.	-	-	The company has filed application for waiver of the fine/ penalty imposed by SEBI	As per the letter dated April 14, 2021 from NSE, the request for waiver of fine was rejected. And date for payment of above said fine was 20th April, 2021, but no information has been provided to us about the status of payment

Madhu
Vendra Madhumita
Practising Company Secretary
M No 52965, CP No: 19626
Place: Hyderabad

Date: 02nd September 2021
UDIN: A052965C000885159

V Madhumita & Associates
Madhu
Vendra Madhumita
Practising Company Secretary
Membership No. A52965

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