

# COMPUCOM

## Software Limited

IT: 14-15 EPIP, RIICO Industrial Area,  
Sitapura, Jaipur -302022 (India)  
Tel. 91-141-2770131, 5115901-02  
Fax: 91-141-2770335, 5115905  
Email: [cs@compucom.co.in](mailto:cs@compucom.co.in)  
CIN: L72200RJ1995PLC009798

No.: CSL/BSE/NSE/CSE/19-20/

Date: - 29.05.2019

1) The Secretary

BSE Limited

1<sup>st</sup> Floor, New Trading Ring,

(BY BSE LISTING CENTRE)

Rotunda Building, Phiroze Jeejeebhoy Towers,

Dalal Street, Fort, Mumbai-400001.

Stock Code: 532339

2) The Secretary

National Stock Exchange of India Limited

Exchange Plaza, 5<sup>th</sup> Floor,

Plot No. C/1, G Block,

Bandra (East), Mumbai-400051.

(BY NSE NEAPS)

Stock Code: COMPUSOFT

3) The Manager,

The Calcutta Stock Exchange Limited

7, Lyons Range, Kolkata: 700001

Stock Code: 13335

(BY E-MAIL)

Sub: Secretarial Audit Compliance Report for the year ended 31<sup>st</sup> March, 2019.

Dear Sir/Madam,

This is in reference to the above.

Pursuant to the Regulation 24A of the Securities Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulation, 2015, please find attached herewith Secretarial Audit Compliance Report for the year ended on 31.03.2019.

You are kindly requested to take the same on record and inform all those concerned.

Thanking You.

Yours Sincerely,

For Compucom Software Limited

  
(Swati Jain)  
Company Secretary

FCS: 8728

Enclosed: A/a



**Secretarial Compliance Report**  
**of**  
**Compucom Software Limited**  
For the year ended March 31, 2019

We M/s V. M. & Associates, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Compucom Software 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 March 31, 2019 ("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, 2009 (repealed w.e.f. 9<sup>th</sup> December, 2018); **(Not applicable to the Company during the Review Period)**
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 notified on 9<sup>th</sup> December, 2018; **(Not applicable to the Company during the Review Period)**
- (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 (repealed w.e.f. 11<sup>th</sup> September, 2018); **(Not applicable to the Company during the Review Period)**
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 notified on 11<sup>th</sup> September, 2018; **(Not applicable to the Company during the Review Period)**





- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during the Review Period)**
- (h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Review Period)**
- (i) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not applicable to the Company during the Review Period)**
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (k) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunder;


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 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) No action has been 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.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **NOT APPLICABLE** being first report after notification of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Place: Jaipur  
Date: May 29, 2019

For V. M. & Associates  
Company Secretaries  
(ICSI Unique Code P1984RJ039200)



  
CS Manoj Maheshwari  
Partner  
FCS 3355  
C P No. : 1971