



Value through values

Ref: SIL/SEC/2020
Date: 16th July, 2020

<p>The Manager Department of Corporate Services The National Stock Exchange of India Ltd. Exchange Plaza, 5th Floor, Plot No. C/1, G Block Bandra Kurla Complex, Bandra (E) <u>Mumbai - 400051</u> Scrip Code: 5251</p>	<p>The Manager, Department of Corporate Services, Bombay Stock Exchange Ltd. Phiroze Jeejeebhoy Towers 25th Floor, Dalal Street, <u>MUMBAI - 400 001</u> Scrip Code: 514234</p>
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Sub: Annual Secretarial Compliance Report for the Financial Year 2019-2020

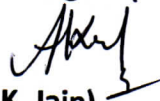
Dear Sir,

Pursuant to Regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 we are enclosing herewith Annual Secretarial Compliance Report for duly signed by the Practicing Company Secretary for the financial year 2019-2020.

The above document is available on the Company's website www.sangamgroup.com. This is for your information and records. Kindly take the same on record.

Thanking you.

Yours faithfully,
For Sangam (India) Limited


(A.K. Jain)
Company Secretary
FCS - 7842



SANGAM (INDIA) LIMITED

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Corporate Office : B/306-309, Dynasty Business Park, A.K. Road, J.B. Nagar, Opp. Sangam Cinema, Andheri (E) Mumbai - 400 059 (MH)
Ph. : +91-22-61115200-299, Fax : +91-22-28227865 (CIN - L17118RJ1984PLC003173)
E-mail : info@sangamgroup.com, Website : www.sangamgroup.com



SECRETARIAL COMPLIANCE REPORT
OF
SANGAM (INDIA) LIMITED
for the year ended 31st March, 2020

We, B K Sharma and Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Sangam (India) 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;
- (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 Review Period.)

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014; (Not applicable during the Review Period.)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008; (Not applicable during the Review Period.)
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares)Regulations,2013; (Not applicable during the Review Period.)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015;
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, 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
1.	Sub-Regulation 4 of Regulation 31 of SEBI (LODR) Regulation, 2015	Sangam E-com Limited has been included in Promoters Group in	It has been observed that Sangam E-com Limited is a company having Directors and





		Shareholding Pattern of Sept. 2019. Sangam E-com Limited purchased 1902320 Equity Shares (4.825%) from Public and Promoters' Shareholding has been increased from 50.05% in June 2019 to 55% in Sept. 2019.	Shareholders who are the Promoter group of the Listed Entity. As per Management representation, in considering the definition of 'Promoter Group' in clause 2(1)(pp) SEBI (ICDR) Regulations, 2018, Sangam E-com Limited should be included in the Promoter Group, hence now included.
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- (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) 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:

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.





- NIL -				

(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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
- NIL -				

For B K Sharma & Associates
Company Secretaries



[BRIJ KISHORE SHARMA]

Proprietor

M. No. : FCS - 6206

COP No.: 12636

UDIN: F006206B000373012

Place: Jaipur
Date: 24 June, 2020