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



Dated – June 28, 2021

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

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 For SHYAM TELECOM LIMITED

SOURABH BANSALY SECRETARY COMPANY SECRETARY

Encl:

1. Secretarial Compliance Report dated June 26, 2021.

Secretarial Compliance Report of Shyam Telecom Limited for the year ended 31st March, 2021under 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.

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 31st March, 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 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) Regulations, 2014 ; -- (Not applicable for the Review Period)



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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - (Not applicable for the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; -- (Not applicable for the Review Period);
- (h) 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, <u>except</u> 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 the 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.
	NIL	NIL	NIL	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 years ended 31.3.2019, * 31.3.2020. (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NIL	NA	NA	NA

For A.N. Kukreja & Co. Company Secretaries P -FCS1070 C.P.2318 *Company Secret (A.N.Kukreja) Proprietor FCS 1070, CP 2318 ICSI Unique Code: 1995DE014900

UDIN: F001070C000519632.

Date: June 26, 2021 Place: New Delhi.