

P.M. TELE LINNKS LTD.

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Telangana, INDIA.

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Website : www.pmtele.in
CIN No. : L27105TG1980PLC002644

Hyderabad, June 30, 2021

To,
BSE Ltd,
PhirozeJeejeebhoy Towers,
25thFloor, Dalal Street,
Mumbai – 400 001

Sub: Annual Secretarial Compliance Report for the FY 2020-21

Ref. Scrip Code- 513403

Respected Sir/Ma'am,

Pursuant to SEBI Circular dated 8th February, 2019, all listed entities are required to submit to the Stock Exchanges within 60 days of the end of the Financial Year, Annual Secretarial Compliance Report, issued by a Practicing Company Secretary based on a check of the Compliance by such listed entity with the applicable SEBI Regulations and Circulars/guidelines issued thereunder.

Accordingly, we enclose herewith the Annual Secretarial Compliance Report of the Company issued by M&K Associates, Practicing Company Secretaries, for the Financial Year 2020-21.

Yours faithfully,

For P.M. TELELINNKS LIMITED



Ravi Surana Pukhraj
Director & CFO
DIN: 01777676





**M&K Associates
Company Secretaries**

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Khairatabad, Hyderabad-500004.
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ANNUAL SECRETARIAL COMPLIANCE REPORT OF P.M. TELELINNKS LIMITED
FOR THE YEAR ENDED MARCH 31, 2021

We have examined:

- (a) all the documents and records made available to us and explanation provided by P.M. Telelinnks 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, 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;

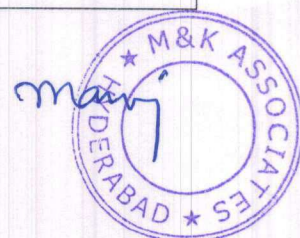


- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable during the FY under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable during the FY under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the FY 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 FY under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable to the listed entity;
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:-

S. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 30 of SEBI(LODR) Regulations, 2015- Submission of Financial Results	Financial Results were submitted in XML format only and not in PDF format, to the stock exchange within 30 minutes of the closure of Board Meeting.	Financials in PDF were submitted subsequently to the stock exchange.
2	Regulation 47 of SEBI (LODR) Regulations, 2015	Notice of the Board Meeting where financial results shall be discussed and also the financial results were not published in the newspaper.	The Company has ensured to send the financial results via email address to the shareholders and also published the same on its website.



(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 (i.e. fine, warning letter, debarment, etc)	Observations/ remarks of the Practicing Company Secretary, if any
1.	Stock Exchange (BSE)	Late Submission of Financial Results in PDF format	Fine of Rs. 53,100/- has been levied	The Company has made a request to the stock exchange to reconsider on the fine levied. Reply is awaited from the Stock Exchange.

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

Sr. No.	Observations in the previous reports	Observations made in the Secretarial Compliance Report for the year ended March, 2020	Action taken by the listed entity	Comments of the PCS on the action taken by the listed entity
1.	Regulation 17(1A) of SEBI (LODR) Regulations, 2015- Special Resolution was not passed for continuation of Directorship of Mr. Casula Raj Kumar, as Independent Director on attainment of the age of 75 years.	March 2020	The Company rectified the said non-compliance by vacation of office of Independent Director, Mr. Casula Raj Kumar	--
2	Regulation 34(a) of SEBI (LODR) Regulations, 2015 – Annual Report - The copy of the Annual	March 2020	The Company submitted the Annual Report to the stock exchange within	--



	Report was not submitted to the stock exchange on the day of commencement of dispatch to its shareholders.		21 days after the Annual General Meeting.	
3	Regulation 47 of SEBI (LODR) Regulations, 2015- Notice of the Board Meeting where financial results shall be discussed and also the financial results were not published in the newspaper.	March 2020	The Company published the notice of the Board meeting on its website and ensured to send the Financial Results via E-mail to all the shareholders at their Registered E-mail Ids and also published the same on its website.	The Company is required to publish the notice of the Board Meeting where financial results shall be discussed and also the financial results in the newspaper. Mere sending of email to its shareholders will not suffice the required under the prescribed regulation.

for M&K Associates
Company Secretaries

Manoj Kumar Koyalkar
Manoj Kumar Koyalkar
Membership No.: F9298
CoP No.: 10004



UDIN: F009298C000555998
Hyderabad, June 30, 2021