

Date: 13.01.2023

To,
The Listing Manager
Listing Department,
The **Bombay Stock Exchange Limited**,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001.

SUB: Request Letter for Waiver of Penalty imposed with respect to for Non-Compliances of Regulation 23 (9) under SEBI (LODR) Regulations, 2015 for the quarter ended 30th September 2022.

Ref: 1.BSE Letter through the mail dated SOP-CReview-(December 27, 2022)

2. Reply mail by the Company dated 28.12.2022 submitting pdf copy of ack dated 14.11.2022 and disclosure of related party transactions

3.BSE Mail dated 28.12.2022

4. Reply mail by the Company dated 30.12.2022 intimating the submission of compliance on 28.12.2022

5. BSE Letter through the mail dated 12th January 2023 regarding reminder for freezing of promoters demat account.

Dear Sir/Madam,

This has reference to your mail dated 27.12.2022 intimating that company has not complied with the Regulation 23 (9) under SEBI (LODR) Regulations, 2015 on disclosures of Related Party Transactions on a consolidated basis for the quarter ended 30th September 2022 and, in this regard, levying a fine of Rs 177000 as fine (Inclusive of GST).

We are attaching herewith, the copy of the mails dated 27th December, 2022, 12th January, 2023 received from BSE Ltd., as Annexures 1.1 and 1.2.





Currently, the Equity Shares of the Company are listed only on BSE Ltd and MSEI Ltd. The Company is particular in complying with all the listing regulations and compliance of SEBI (LODR) Regulations.

The fine levied for non-submission of disclosures of Related Party Transactions on a consolidated basis for the quarter ended 30th September 2022 in XBRL mode within 30 days from the date of declaration of Financial Results.

This is to bring your notice that the company has submitted pdf copy of on disclosures of Related Party Transactions on a consolidated basis for the quarter ended 30th September 2022 on 14.11.2022 i.e., within 30 days from the date of declaration of Financial Results but failed to submit through XBRL.

The non-compliance pointed out by the BSE Ltd was non submission of disclosures of Related Party Transactions on a consolidated basis for the quarter ended 30th September 2022 in XBRL mode.

In this connection we have to submit that the company has submitted pdf copy of disclosure on 14.11.2022 and we would like to state that our Company has always been meticulous in complying with SEBI Regulations/Companies Act, 2013 but the company has failed to submit the disclosure on related party transaction in XBRL as on 30.09.2022 due to inadvertence. The said delay is not intentional but purely owing to inadvertence and did not involve any mala-fide intention to suppress material facts as we have submitted the disclosure in pdf.

Further, we bring your notice that submission of disclosures of Related Party Transactions on a consolidated basis for the quarter ended 30th September, 2022 in XBRL mode has made mandatory from the half year ended 30.09.2022 only.

The company has sent a reply mail dated 30.12.2022 to BSE Ltd requesting for waiver of penalty explaining the physical submission of Disclosure. We are once again attaching herewith, copy of said mail as Annexure-2.

The Company has been always a law-abiding Company that always ensures to comply the compliances with all applicable laws and regulations within due date as prescribed and believed that Good Corporate Governance practices have been followed. Good Corporate Governance Practices have always been a top priority of the Management of the company.

In view of this, you are requested not to initiate any fine/penalty on the Company and withdraw the notice issued to the Company.





Your kind and immediate cooperation in the matter is requested.

We confirm and undertake that such mistakes shall not occur in the future and we will be more vigilant in the future.

We assure that such instances will not be repeated in future transactions.

Thanking you,

Yours Sincerely,

For M/s. Nettlinx Limited



Sai Ram Gandikota
Company Secretary & Compliance Officer

CS Sairam

From: Reena Raphael <reena.raphael@bseindia.com>
Sent: 27 December 2022 18:56
To: cs@nettlinx.org
Cc: bse.soplodr
Subject: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

Ref.: SOP-CReview-(December 27, 2022)
To
The Company Secretary/Compliance Officer
Company Name: Nettlinx Ltd
Scrip Code: 511658

Dear Sir/Madam,

Sub: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

The company is advised to refer to Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

[https://www.bseindia.com/downloads1/Guidance Note for SEBI SOP Circular.pdf](https://www.bseindia.com/downloads1/Guidance%20Note%20for%20SEBI%20SOP%20Circular.pdf)

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed	Status of Compliance	Fine payable by the company (inclusive of GST @ 18 %)		
			Basic Fine(Rs.)	GST @ 18 %	Total Fine payable(Rs.)
Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	Rs. 5,000/- per day till the date of compliance.	Non Submission	145000	26100	171100

As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter.** The company is advised to bring the provisions of this Circular to the notice of promoter of the company.

- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

(For assistance in login on listing center the company can contact helpdesk on Tel. No. 022-61363155 or email id: listing_centre@bseindia.com and for XBRL related queries company may contact on Toll free no. 18002330445 or send emails to bse.xbrl@bseindia.com).

In case of any further queries / clarifications please email at the following ids:

Regulation	Contact person	Contact Number	Group Email Id
Reg. 23(9)	Mr. Harshad Naik	022-2222725650	bse.soplodr@bseindia.com

Yours faithfully

Sambhaji Solat
Manager
Listing Compliance

Harshad Naik
Deputy Manager
Listing Compliance

Company is requested to remit the fine amount through electronic transfer to the designated bank - details given below:

Company Name	Nettlinx Ltd		
Bank Name	Branch Name	Account No.	IFSC Code
ICICI Bank Limited	CMS Branch	BSER06065	ICIC0000104

or through cheque favoring **BSE Ltd.** The company is required to submit the cheque alongwith the covering letter (format given at Annexure I below):

Annexure-I (On letterhead of the company)

Listing Compliance, BSE Limited, Ground Floor,
P. J. Towers, Fort, Mumbai-400001.

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

Scrip Code	Regulation & Quarter	Amount paid	TDS deducted, if any	Net Amount paid	GST No. (Mandatory to upload on BSE Listing Centre) (*)

No of company is not uploaded on the Listing Centre or Declaration for Unregistered Dealer is not received by us, company can not claim any GST input credit for the invoices raised by us.)

Remitted by:

Cheque/DD No.	Date	UTR No. for RTGS /NEFT

Compliance Officer / Company Secretary.

- Please mention the Regulation No., Quarter, and amount of TDS deducted on the reverse side of the Cheque/Demand Draft.
- In case of payment through RTGS/NEFT, you are requested to send a soft copy of this annexure to bse.soplodr@bseindia.com

Thanks and Regards,

Reena Raphel

Associate Manager
Listing Compliance

BSE Limited, MUMBAI
Phone (Direct) : 22728194

This mail is classified as 'BSE - CONFIDENTIAL' by reena.raphel on December 27, 2022 at 18:55:55.

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CS Sairam

From: Reena Raphael <reena.rafael@bseindia.com>
Sent: 12 January 2023 19:31
To: cs@nettlinx.org
Subject: Revised Mail - Reminder for freezing of promoter demat account for Reg 23(9)- Half Yearly Sep-22

Ref.: SOP-Reminder-January 2023

To;
Company Secretary & compliance officer/ Promoter of the company
Company Name: Nettlinx Ltd
Scrip Code: 511658

Dear Sir/Madam,

Sub: Reminder for freezing of promoter demat account (action under SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020)

SEBI vide its circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 (SEBI SOP Circular) has inter alia prescribed certain penal actions such as levy of financial fines, freezing of promoter demat accounts, transfer to Z group (Trade for Trade) ending with suspension of trading in the securities of the listed entities which do not comply with critical regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

It is observed that as per the latest shareholding pattern report submitted by the **Nettlinx Ltd, (scrip code:511658)**, your name has been included in the list of promoters of the company.

The company is non-compliant/not paid fines with the provisions of following Regulation(s) for the period mentioned below. As mandated in the SEBI SOP circular the company has been intimated about the pending compliance and has also been informed that **all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid.**

The details of fines levied, inter alia, pursuant to SEBI SOP Circular dated January 22,2020 are as under:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Status of Compliance	Fine amount outstanding (incl. GST @ 18 %) (Amount in Rs.)	Fines levied for
Regulation 23 (9)	Late Submission	177000	Half Yearly Sep-22
Total Fines		177000	

Note: In case of Non-Compliance the fines will continued to be levied till the date of compliance.

As per Exchange records, it is observed that the company **has not yet complied/ not paid the fines.** Therefore, as in duty bound in terms of the provisions of SEBI SOP circular the Exchange would be proceeding to give instructions to the depositories to **freeze the demat accounts of all the entities mentioned in the shareholding pattern by the company, within 10 days from the date of this communication.**

*It may also be noted that presently the SEBI circular stipulates that the freeze on promoter demat accounts should **be lifted only after the company complies and pays fines.***

(Note: For unfreezing of promoters demat accounts, the Company is required to comply with all the pending compliances and pay all the outstanding fines levied under SEBI SOP Circular dated January 22, 2020 (Erstwhile SEBI Circulars dated May 03, 2018; November 30, 2015 and September 30, 2013).

In case of any queries in the matter, you are advised to kindly take up the matter with the company,

Company is requested to transfer the fine amount in the following bank account and confirm the remittance details i.e.UTR No./NEFT Details/Cheque No., etc. on our email id: bse.soplodr@bseindia.com

Bank Name	Account Number of BSE Ltd	IFSC CODE	Branch
ICICI Bank	BSER06065	ICIC0000104	CMS Branch

It may be noted that the Policy for exemption of fines detailing the reasons for waiver / reduction of fines levied as per the provisions of SEBI SOP circular is disseminated on the Exchange website at the following link:

[https://www.bseindia.com/downloads1/Policy for Exemption of Fines SOP.pdf](https://www.bseindia.com/downloads1/Policy%20for%20Exemption%20of%20Fines%20SOP.pdf)

It may further be noted that:

- An application for waiver of fines submitted by the company if any, will be considered **only after the applicant company has first complied with the compliances for which it is seeking full / partial waiver of fines**, as required under the Listing Regulation.
- An illustrative list of scenarios which cannot be considered to fall within the ambit of "events" entailing waiver or reduction of fine has been included in the policy disseminated on the Exchange website at aforesaid link.
- The decision of the Exchange shall be final and repeated applications for waivers that are declined earlier, would not be entertained, unless there are any mitigating fresh facts. The Exchange reserves the right to accede to or deny the request for waiver/ reduction in penalty, for reasons to be recorded in writing.

Thanks and Regards,

Reena Raphel
Associate Manager
Listing Compliance

BSE Limited, MUMBAI
Phone (Direct) : 22728194

This mail is classified as 'BSE - PUBLIC' by reena.raphel on January 12, 2023 at 19:30:32.

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CS Sairam

From: Harshad Naik <Harshad.Naik@bseindia.com>
Sent: 28 December 2022 13:02
To: CS@nettlinx.org
Cc: Reena Raphael; secretarial@nettlinx.org; bse.soplodr; loka@nettlinx.org; nvr@nettlinx.org
Subject: RE: RE: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020
Attachments: related party transactions 30.09.2022.pdf; 4783635.pdf

Dear Sir,

Enclosed details appear to be of PDF submission. Please note that Disclosure of 23(9) was required to be submitted in XBRL only.

Please provide the acknowledgement copy for submission of XBRL.

Regards

Harshad Naik
Deputy Manager
Listing Compliance

BSE Limited, P J Towers, Dalal Street, Mumbai -400001, India
Phone : 22 22725650

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----- Forwarded Message -----

This mail is classified as 'BSE - CONFIDENTIAL' by Harshad.Naik on December 28, 2022 at 13:02:05.

From: "CS Sairam" <CS@nettlinx.org>
To: "Reena Raphael" <reena.rafael@bseindia.com>; secretarial@nettlinx.org
Cc: "bse.soplodr" <bse.soplodr@bseindia.com>; loka@nettlinx.org; nvr@nettlinx.org
Sent: 28-12-2022 10:36:49
Subject: RE: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

***CAUTION*:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

We have submitted the disclosure of related party transactions on consolidated basis for the half year ended 30.09.2022 on 14.11.2022. The acknowledgement for the same is attached for your reference.

Assuring you of our best attention at all times.

Thanks & Regards

Sai Ram Gandikota

Company Secretary & Compliance Officer

M/s.Nettlinx Limited

Mobile:9652542426 [Email:cs@nettlinx.org](mailto:cs@nettlinx.org)

From: Reena Raphel <reena.raphel@bseindia.com>

Sent: 27 December 2022 18:55

To: secretarial@nettlinx.org

Cc: bse.soplodr <bse.soplodr@bseindia.com>

Subject: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

Ref.: SOP-CReview-(December 27, 2022)

To

The Company Secretary/Compliance Officer

Company Name: Nettlinx Ltd

Scrip Code: 511658

Dear Sir/Madam,

Sub: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

The company is advised to refer to Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

[https://www.bseindia.com/downloads1/Guidance Note for SEBI SOP Circular.pdf](https://www.bseindia.com/downloads1/Guidance%20Note%20for%20SEBI%20SOP%20Circular.pdf)

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed	Status of Compliance	Fine payable by the company (inclusive of GST @ 18 %)		
			Basic Fine(Rs.)	GST @ 18 %	Total Fine payable(Rs.)

Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	Rs. 5,000/- per day till the date of compliance.	Non Submission	145000	26100	171100
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As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter.** The company is advised to bring the provisions of this Circular to the notice of promoter of the company.
- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

(For assistance in login on listing center the company can contact helpdesk on Tel. No. 022-61363155 or email id: listing.centre@bseindia.com and for XBRL related queries company may contact on Toll free no. 18002330445 or send emails to bse.xbrl@bseindia.com).

In case of any further queries / clarifications please email at the following ids:

Regulation	Contact person	Contact Number	Group Email Id
Reg. 23(9)	Mr. Harshad Naik	022-2222725650	bse.soplodr@bseindia.com

Yours faithfully

Sambhaji Solat
Manager
Listing Compliance

Harshad Naik
Deputy Manager
Listing Compliance

Company is requested to remit the fine amount through electronic transfer to the designated bank - details given below:

Company Name	Nettlinx Ltd		
Bank Name	Branch Name	Account No.	IFSC Code
ICICI Bank Limited	CMS Branch	BSER06065	ICIC0000104

or through cheque favoring **BSE Ltd.** The company is required to submit the cheque alongwith the covering letter (format given at Annexure I below):

Annexure-I (On letterhead of the company)

Listing Compliance, BSE Limited, Ground Floor,
P. J. Towers, Fort, Mumbai-400001.

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

Scrip Code	Regulation & Quarter	Amount paid	TDS deducted, if any	Net Amount paid	GST No. (Mandatory to upload on BSE Listing Centre) (*)
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No of company is not uploaded on the Listing Centre or Declaration for Unregistered Dealer is not received by us, company can not claim any GST input credit for the invoices raised by us.)

Remitted by:

Cheque/DD No.	Date	UTR No. for RTGS /NEFT

Compliance Officer / Company Secretary.

- Please mention the Regulation No., Quarter, and amount of TDS deducted on the reverse side of the Cheque/Demand Draft.
- In case of payment through RTGS/NEFT, you are requested to send a soft copy of this annexure to bse.soplodr@bseindia.com

Thanks and Regards,

Reena Raphel
Associate Manager
Listing Compliance

BSE Limited, MUMBAI
Phone (Direct) : 22728194

This mail is classified as 'BSE - CONFIDENTIAL' by reena.raphel on December 27, 2022 at 18:55:04.

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CS Sairam

From: CS Sairam <CS@nettlinx.org>
Sent: 30 December 2022 10:37
To: 'Harshad Naik'
Cc: 'Reena Raphael'; 'secretarial@nettlinx.org'; 'bse.soplodr'; 'loka@nettlinx.org'; 'nvr@nettlinx.org'; 'upenderacs@gmail.com'
Subject: RE: RE: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020
Attachments: related party transactions 30.09.2022.pdf; 4783635.pdf; Acknowledgement XBRL.pdf

Dear Sir,

We are herewith attaching the XBRL filed ack dated 28.12.2022 for your reference.

We have submitted the disclosure on related party transaction on consolidated basis in pdf as on 30.09.2022 on 14.11.2022, the ack for the same also attached for your reference.

We would like to state that our Company has always been meticulous in complying with SEBI Regulations/Companies Act, 2013 but the submission of the disclosure on related party transaction in XBRL as on 30.09.2022 due to technical issues got delayed. The said delay is not intentional but purely owing to inadvertence and did not involve any mala-fide intention to suppress material facts as we have submitted the disclosure in pdf.

The Company has been always a law-abiding Company that always ensures to comply the compliances with all applicable laws and regulations within due date as prescribed and believed that Good Corporate Governance practices have been followed. Good Corporate Governance Practices have always been a top priority of the Management of the company.

In view of this, you are requested not to initiate any fine/penalty on the Company and withdraw the notice issued to the Company.

Your kind and immediate cooperation in the matter is requested.

We confirm and undertake that such mistakes shall not occur in the future and we will be more vigilant in the future.

We assure that such instances will not be repeated in future transactions.

Assuring you of our best attention at all times.

Thanks & Regards

Sai Ram Gandikota

Company Secretary & Compliance Officer

M/s.Nettlinx Limited

Mobile:9652542426 [Email:cs@nettlinx.org](mailto:cs@nettlinx.org)

From: Harshad Naik <Harshad.Naik@bseindia.com>

Sent: 28 December 2022 13:02

To: CS@nettlinx.org

Cc: Reena Raphael <reena.raphel@bseindia.com>; secretarial@nettlinx.org; bse.soplodr <bse.soplodr@bseindia.com>; loka@nettlinx.org; nvr@nettlinx.org

Subject: RE: RE: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

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Regards

Harshad Naik

Deputy Manager

Listing Compliance

BSE Limited, P J Towers, Dalal Street, Mumbai -400001, India
Phone : 22 22725650

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----- Forwarded Message -----

This mail is classified as 'BSE - CONFIDENTIAL' by Harshad.Naik on December 28, 2022 at 13:02:05.

From: "CS Sairam" <CS@nettlinx.org>

To: "Reena Raphael" <reena.raphel@bseindia.com>; secretarial@nettlinx.org

Cc: "bse.soplodr" <bse.soplodr@bseindia.com>; loka@nettlinx.org; nvr@nettlinx.org

Sent: 28-12-2022 10:36:49

Subject: RE: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

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Dear Sir/Madam,

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Assuring you of our best attention at all times.

Thanks & Regards

Sai Ram Gandikota

Company Secretary & Compliance Officer

M/s.Nettlinx Limited

Mobile:9652542426 [Email:cs@nettlinx.org](mailto:cs@nettlinx.org)

From: Reena Raphel <reena.raphel@bseindia.com>

Sent: 27 December 2022 18:55

To: secretarial@nettlinx.org

Cc: bse.soplodr <bse.soplodr@bseindia.com>

Subject: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

Ref.: SOP-CReview-(December 27, 2022)

To

The Company Secretary/Compliance Officer

Company Name: Nettlinx Ltd

Scrip Code: 511658

Dear Sir/Madam,

Sub: Fine levied for Non/Late compliance with Reg.23(9) for half year ended September 2022 as per SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020

The company is advised to refer to Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

[https://www.bseindia.com/downloads1/Guidance Note for SEBI SOP Circular.pdf](https://www.bseindia.com/downloads1/Guidance%20Note%20for%20SEBI%20SOP%20Circular.pdf)

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed	Status of Compliance	Fine payable by the company (inclusive of GST @ 18 %)
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			Basic Fine(Rs.)	GST @ 18 %	Total Fine payable(Rs.)
Regulation 23 (9) Non-compliance with disclosure of related party transactions on consolidated basis.	Rs. 5,000/- per day till the date of compliance.	Non Submission	145000	26100	171100

As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter.** The company is advised to bring the provisions of this Circular to the notice of promoter of the company.
- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

(For assistance in login on listing center the company can contact helpdesk on Tel. No. 022-61363155 or email id: listing.centre@bseindia.com and for XBRL related queries company may contact on Toll free no. 18002330445 or send emails to bse.xbrl@bseindia.com).

In case of any further queries / clarifications please email at the following ids:

Regulation	Contact person	Contact Number	Group Email Id
Reg. 23(9)	Mr. Harshad Naik	022-2222725650	bse.soplodr@bseindia.com

Yours faithfully

Sambhaji Solat
Manager
Listing Compliance

Harshad Naik
Deputy Manager
Listing Compliance

Company is requested to remit the fine amount through electronic transfer to the designated bank - details given below:

Company Name	Nettlinx Ltd		
Bank Name	Branch Name	Account No.	IFSC Code
ICICI Bank Limited	CMS Branch	BSER06065	ICIC0000104

or through cheque favoring **BSE Ltd.** The company is required to submit the cheque alongwith the covering letter (format given at Annexure I below):

Annexure-I (On letterhead of the company)

Listing Compliance, BSE Limited, Ground Floor,
P. J. Towers, Fort, Mumbai-400001.

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

Scrip Code	Regulation & Quarter	Amount paid	TDS deducted, if any	Net Amount paid	GST No. (Mandatory to upload on BSE Listing Centre) (*)

No of company is not uploaded on the Listing Centre or Declaration for Unregistered Dealer is not received by us, company can not claim any GST input credit for the invoices raised by us.)

Remitted by:

Cheque/DD No.	Date	UTR No. for RTGS /NEFT

Compliance Officer / Company Secretary.

- Please mention the Regulation No., Quarter, and amount of TDS deducted on the reverse side of the Cheque/Demand Draft.
- In case of payment through RTGS/NEFT, you are requested to send a soft copy of this annexure to bse.soplodr@bseindia.com

Thanks and Regards,

Reena Raphel
Associate Manager
Listing Compliance

BSE Limited, MUMBAI
Phone (Direct) : 22728194

This mail is classified as 'BSE - CONFIDENTIAL' by reena.raphel on December 27, 2022 at 18:55:04.

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