

Dated: 29th June, 2021

To
The Listing Department
The National Stock Exchange of India Limited
Exchange Plaza,
Plot No. C/1, G Block,
Bandra (E)
Mumbai – 400 051

Dear Sir,

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2021

**Reg: SPACENET ENTERPRISES INDIA LIMITED (“The Company”)
: Trading Symbol: SPCENET**

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with SEBI Circular ref. No. CIR/CFD/CMD1/27/2019 dated 08th February 2019, please find attached the Annual Secretarial Compliance Report for financial year ended 31st March 2021.

This is for your information and necessary records.

Yours Faithfully

For **SPACENET ENTERPRISES INDIA LIMITED**



M. Chowda Reddy
Company Secretary & Compliance Officer



Encl: As Above

**Secretarial compliance report of SPACENET ENTERPRISES INDIA LIMITED
(CIN: L72200TG2010PLC068624) for the year ended 31st March, 2021
Under Reg 24A of SEBI LODR-2015**

I D. Balarama Krishna, Company Secretary in Practice have examined:

- (a) All the documents and records made available to us and explanation provided by SPACENET ENTERPRISES 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, 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 as there was no case of buy back during the period under review]**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not Applicable as there was no debt securities listed on the stock exchange]**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not Applicable as there was no Non-Convertible and Redeemable Preference Shares listed on the stock exchange]**

D. Balarama Krishna



(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(j) SEBI Circular number: SEBI/HO/DDHS/CIR/P/2018/144 dated 26th November, 2018.

and based on the above examination, I 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: -

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
01.	Regulation 23 (9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015: Related Party Transactions: disclosures of RPTs on a consolidated basis. Within 30 days from the date of publication of its standalone and consolidated financial results for each half of the financial year. Due Date: 25th July, 2020 (25-07-2020)	Due Date: 25th July, 2020 (25-07-2020) Actual Date of filing: 05 th August 2020 (05-08-2020)	The company has lately complied the specified regulation for the half year ended 31 st March 2020.
02.	SEBI Circular number: SEBI/HO/DDHS/CIR/P/2018/144 dated 26 th November, 2018. Initial Disclosures by Large Corporates has to be given to the stock exchanges within 30 days from the beginning of the F.Y.	Due Date: 30th April, 2020. 12 th August 2020 (12-08-2020)	The company has given the information to the stock exchange about being a non-large corporate. This information was submitted lately.
03.	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015: Trading window has to be closed from the end of the quarter till 48 hours of the conclusion of the financial result declaration.	Due Date: 31-03-2020. Actual Date of submitting information: 01-04-2020	The company has closed the trading window from 02-04-2020 which is late compliance.

D. Balarama Krishna



04.	Regulation 44(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015: Voting results of the general meeting has to be submitted to the stock exchange within 48 hours of conclusion of General Meeting.	Due Date: 22-07-2020 (11:48 a.m.) Actual Date of filing: 22-07-2020 (11:27 p.m.)	The company has complied with the specified regulation lately by almost 11 hours).
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(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 my 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.
No fines and actions taken by the Stock exchange against the company.				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **[Not Applicable as this is the first annual secretarial compliance report of the company.]**

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
N. A				

Place: Hyderabad
Date: 29.06.2021
UDIN: F008168C000542174



Signature: *D. Balarama Krishna*
D. Balarama Krishna
FCS No.: 8168
C P No.: 22414.