

Annual Secretarial Compliance Report
For the Financial Year Ended 31st March, 2022
(Regulation 24A of Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,
The Board of Directors,
Spacenet Enterprises India Limited,
CIN: L72200TG2010PLC068624
Plot No.114, Survey No.66/2,
Raidurgam, Gachibowli,
Prasanthhills, Navkhalsa,
Serilingampally, Hyderabad,
Rangareddi, Telangana – 500008.

I, **Balarama Krishna Desina**, 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, 2022 ("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 as there was no case of buy back during the period under review]**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(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]**

(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) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

And circulars/guidelines issued thereunder;

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 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
NOT APPLICABLE			

(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 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:

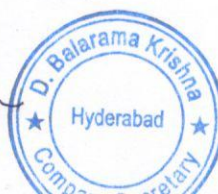
D. Balaram Krishna


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.
01.	National Stock Exchange of India Limited (NSE)	Regulation 29 of SEBI (LODR) Regulations, 2015: Prior Intimation of Board meeting	Fine imposed as follows: Fine: Rs. 10,000 IGST: Rs. 1,800 Total = Rs. 11,800/-	The company has paid the same and placed before the board and discussed that utmost care will be taken by the company while giving intimations to stock exchanges and informed the same to NSE

(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 31 st March, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
01.	The company has lately complied the 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 for the half year ended 31 st March 2020	Due Date: 25 th July, 2020 (25-07-2020) Actual Date of filing: 05 th August 2020 (05-08-2020)	The company has taken into account these delay filings/intimations and looks to not repeat the same in future by taking formulating proper procedures and steps as those delays happened during the period where there was no company secretary	We observed that during Review Period, that there were no delay filings made by the company
02.	The company has given the information to the stock exchange about being a non- large corporate	Due Date: 30 th April, 2020.		

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	lately. 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.	Actual Date of Submission: 12 th August 2020 (12-08- 2020)	appointed at that time and also delay filings happened due to severe covid -19 pandemic spread over the country and strict lock down imposed by the government the hence company faced various	with respect to delay filings as we reported in the previous report.
03.	The company has closed the trading window from 02-04-2020 which is late compliance. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:	Due Date: 31- 03-2020. Actual Date of submitting information: 01-04-2020.	communication Problems for availing the proper data/information and physical documents from concerned authorised persons for submitting to stock exchanges and the company strongly decided to not repeat the same delays in future and shall abide the same and comply SEBI Regulations with strict compliance for better corporate governance practices in order to achieve the confidence of all stakeholders of the company.	Further observed that the company also filed all disclosures with the stock exchange Within the timelines specified under SEBI Regulations during the review period.
04.	The company has complied with the specified regulation lately by almost 11 hours). 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.).		

UDIN: F008168D000391463

Place: Hyderabad
Date: 26.05.2022



Signature: *D. Balarama Krishna*
Balaramakrishna Desina
Company Secretary in Practice
Membership No.: FCS 8168
C P No.: 22414.
Peer Reviewed UIN: 12019TL1988700