



SECRETARIAL COMPLIANCE REPORT
OF
SANGAM (INDIA) LIMITED
for the year ended 31st March, 2021

We, B K Sharma and Associates, Company Secretaries e, have examined:

- (a) all the documents and records made available to us and explanation provided by Sangam (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 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 during the Review Period.)*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable during the Review Period.)*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during the Review Period.)*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable during the Review Period.)*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder;

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 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
1.	Clause (b) of Sub-Regulation 1 of Regulation 31 of SEBI (LODR) Regulations, 2015.	The Shareholding Pattern for Quarter ended 31.12.2020 has been submitted by the company to BSE with delay of 25 days.	The same has been submitted to NSE in time. BSE has charged fine as per SEBI Circular No. SEBI/HO/CFD/CMD /CIR/P/2020/12 dated 22.01.2020. The Company has paid the same.
2	Clause (c) of Sub-Regulation 1 of Regulation 31 of SEBI (LODR) Regulations, 2015.	The Shareholding Pattern required to be filed within 10 days from the date of Allotment of Equity Shares to promoters on Preferential basis has been submitted by the company to BSE with delay of 1 days.	The same has been submitted to NSE in time. BSE has charged fine as per SEBI Circular No. SEBI/HO/CFD/CMD /CIR/P/2020/12 dated 22.01.2020. The Company has paid the same.

(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/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 thereunder:

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 -				

- (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 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
1.	-	It has been observed that Sangam E-com Limited (SEL) is a company having Directors and Shareholders who	The Listed Entity has revised the Shareholding Patterns from the quarter ended on 31st December, 2015	The observation made in the Secretarial Compliance Report for the year ended on 31.03.2020 has





		were the Promoter group of the Listed Entity As per Management representation, in considering the definition of 'Promoter Group' in clause 2(1)(pp) SEBI (ICDR) Regulations, 2018, Sangam E-com Limited should be included in the Promoter Group, hence now included.	to the Quarter ended on 30th June, 2019 and included the name of Sangam E-com Limited in the Promoter Group with the permission of BSE & NSE. All the Shareholding Patterns were submitted to BSE & NSE online.	been rectified and Sangam E-com Limited has been included in Promoter Group and Shareholding Pattern has been updated hence now it has complied.
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For **B K Sharma & Associates**
Company Secretaries




[BRIJ KISHORE SHARMA]

Proprietor

M. No. : FCS - 6206

COP No.: 12636

UDIN: **F006206C000258557**

Place: Jaipur

Date: 5th May, 2021