



Speed  
Reliability  
Value Performance

## COMPUAGE INFOCOM LTD

29<sup>th</sup> May, 2021

To,  
The Corporate Services Dept.  
BSE Ltd.  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001.

National Stock Exchange of India Ltd.,  
Exchange Plaza,  
C-1, Block G, Bandra Kurla Complex,  
Bandra (E),  
Mumbai - 400 051.

Security Code: 532456  
ISIN: INE070C01037

Symbol: COMPINFO

**Sub: Submission of Annual Secretarial Compliance Report for year ended 31<sup>st</sup> March, 2021**

Dear Sir / Ma'am,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019; please find enclosed herewith the Annual Secretarial Compliance Report issued by BNP & Associates, Practicing Company Secretaries, for the financial year ended 31<sup>st</sup> March, 2021.

This is for your information and records.

Thanking you.

Yours faithfully,

For Compuage Infocom Limited,

Anmol Jolly  
Company Secretary



Place: Mumbai

Encl: As above.

**SECRETARIAL COMPLIANCE REPORT OF COMPUAGE INFOCOM LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2021**

**To,  
The Board of Directors  
Compuage Infocom Limited**

We BNP & Associates have examined:

- (a) all the documents and records made available to us and the explanations provided by **COMPUAGE INFOCOM LIMITED** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchange(s),
- (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 31<sup>st</sup> March 2021 (“Review Period”) in respect of the 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 (Registrars to an Issue and Share Transfer Agents) Regulations, 1993
- (e) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and

(f) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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	Regulation 17 (1) (c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company was not having a minimum of six directors on its Board from 01 <sup>st</sup> April 2020 to 17 <sup>th</sup> July, 2020.	The Company is in compliance with the said requirement w.e.f. 18 <sup>th</sup> July, 2020.

(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 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 Exchange (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.	Observation s/ remarks of the Practicing Company Secretary, if any.
1	BSE Limited and the National Stock Exchange of India Limited	Violated Regulation 17 (1) (c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	<p>BSE Limited vide its e-mail communications dated 20<sup>th</sup> August 2020 and 17<sup>th</sup> November 2020 levied a fine of Rs. 4,55,000 and 2,40,000 (excluding GST @ 18%) respectively. However, the Company has made an application for waiver of the fine and the same is still pending as on end of the year.</p> <p>National Stock Exchange of India (NSE) Limited vide its letter dated 14<sup>th</sup> June 2020 levied a fine of Rs. 6,95,000 (excluding GST @ 18% ) and the same was reiterated in</p>	The Company is in compliance with the said requirement w.e.f. 18 <sup>th</sup> July, 2020

			response to the waiver application made by the Company The Company received letter from NSE Limited on 29 <sup>th</sup> April 2021 for non-payment of fine amount and the Company deposited the amount of fine on 05 <sup>th</sup> May 2021.	
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(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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				

**For BNP & Associates**  
**Company Secretaries**  
**[Firm Regn. No. P2014MH037400]**

**Avinash Bagul**  
**Partner**  
**FCS No.:-5578 /CP No.:- 19862**  
**PR No.:-637 / 2019**  
**UDIN:- F005578C000391227**

**Place:- Mumbai**  
**Date:- 29.05.2021**