



**June 28, 2021**

**To,  
Manager (CRD),  
BSE Ltd.,  
P.J. Tower, Dalal Street,  
Mumbai- 400001**

**Ref: Scrip Code – 540027**

Dear Sir / Madam,

**Subject: Annual Secretarial Compliance Report for the for the year ended March 31, 2021  
as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)  
Regulations, 2015 ("Listing Regulations")**

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Pursuant to Regulation 24A of the Listing Regulations, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2021.

This will also be hosted on the Company's website, at [www.prabhatgroup.net](http://www.prabhatgroup.net).

This is for your information and records.

Thanking you,

For **PRABHAT TECHNOLOGIES (INDIA) LIMITED**

  
Aastha Kochar



Company Secretary & Compliance Officer

Encl: a/a

**PRABHAT TECHNOLOGIES (INDIA) LIMITED**

(Formerly known as Prabhat Telecoms (India) Limited)

CIN: L72100MH2007PLC169551

**MAMTA DEVPURA & ASSOCIATES  
COMPANY SECRETARIES**



IB-202, Green Meadows CHSL, Lokhandwala Township, Kandivali (East), Mumbai 400101  
Email: [mamtadevpura.md@gmail.com](mailto:mamtadevpura.md@gmail.com) Tel. 9530078512

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**SECRETARIAL COMPLIANCE REPORT OF PRABHAT TECHNOLOGIES (INDIA)  
LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

To,  
The Members,  
**PRABHAT TECHNOLOGIES (INDIA) LIMITED**  
Unit No. 402, Western Edge I, Kanakia Spaces,  
Western Express Highway, Borivali (East)  
Mumbai- 400066

I, Mamta Devpura, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to me and explanation provided by **PRABHAT TECHNOLOGIES (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 31<sup>st</sup> 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 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");

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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; (Not applicable to the company during the review period).
- 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 to the company during the review period).
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the company during the review period).
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the company 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 to the company during the review period);
- 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) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

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(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.	Intimation for Closure of Trading Window as per SEBI (Prohibition of Insider Trading) Regulations, 2015.	Intimation for the quarter ended 30 <sup>th</sup> September, 2020 was not given to BSE Limited.	--
2.	Disclosure under Regulation 74(5) of the SEBI (DP) Regulations, 2018 relating to disclosure of Certificate from Registrar and share transfer Agent	Disclosure was not made for the quarter ended 31 <sup>st</sup> March, 2020, 30 <sup>th</sup> June, 2020 and 30 <sup>th</sup> September, 2020.	--
3.	Submission of Quarterly financial result along with Limited Review Report under Regulation 33 of the SEBI (LODR) Regulations, 2015.	The Company has submit financial result along with Limited Review Report of quarter ended 31 <sup>st</sup> March, 2020, 30 <sup>th</sup> June, 2020 and 30 <sup>th</sup> September, 2020 on 17 <sup>th</sup> December, 2020	Due to Covid-19 Pandemic the Auditor M/s Harish Arora & Associates was unable to finalised the Financial Result for the year ended 31st March 2020 on time and Company have been requested to BSE for seek extension of time for Submission of Audited Financial result for the Financial Year ended 31st March 2020. Accordingly, the Financial Result for the year ended 31st March 2020 as well as the quarter ended 30th June 2020 and 30th September 2020 were delayed and submitted

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			on 17th December 2020.
4.	Annual General Meeting under SEBI (LODR) Regulations, 2015.	Annual General Meeting for the Financial Year 2019-20 held on 30 <sup>th</sup> March, 2021.	The Company has filed an application for extension of Annual General Meeting for the Financial Year 2019-20 to the ROC in GNL - 1 vide SRN No. R76062199.

\* The Regulation 17 to 21 of SEBI (LODR), 2015 shall not be applicable to Company as the Company is under insolvency resolution process period through Mr. Rajendra K Bhuta the Interim Resolution Professional for the company vide order dated 10<sup>th</sup> October, 2019 by Hon'ble NCLT, Mumbai Bench having CP No. 1874/NCLT/MB/2019.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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 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				

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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 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Appointment of Compliance officer under Regulation 6 of the SEBI (LODR) Regulations, 2015.	The Company has already started the process for the appointment of compliance officer and appoint the compliance officer soon.	The Company has appointed Ms. Aastha Kochar as a Compliance officer on Board Meeting held on the 17 <sup>th</sup> Dec, 2020	—

For Mamta Devpura & Associates  
Company Secretaries

**MAMTA  
DEVPURA**

Digitally signed by MAMTA DEVPURA  
DN: cn=M. Devpura,  
2.5.4.20=f6e0bde9f90826402b13bc95e565  
c46e924cc27d1f4bc9eaf7d55c664d3a51,  
postalCode=511332, serialNumber=1,  
serialNumber=0602678c227ee0371e47440  
406c6117ab21ee726d160096719a91216de2  
bc1, cn=MAMTA DEVPURA  
Date: 2021.06.28 16:59:57 +05'30'

Mamta Devpura  
Proprietor  
M. No. : A51792  
COP No.: 19242  
UDIN : A051792C000523714

Place: Mumbai  
Date: 27<sup>th</sup> June 2021