

Corporate Office: 3rd Floor, J K Building,
Local Shopping Complex,
Masjid Moth, Greater Kailash II,
New Delhi – 110048
PHONES: 011-42424000, FAX:011-42424099
www.samtel-india.com
CIN No.: L31909RJ1981PLC012073

Courier/Regd. Post

July 30, 2020

The Executive Director / Secretary,
B S E Ltd.,
Deptt. of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.

Reg.: Submission of Compliance Report for the financial year ended 31st March, 2020 under Clause 24(A) of the SEBI (Listing Obligations & Disclosure Requirement) 2015 as amended from time to time.

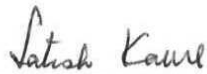
Dear Sir,

In compliance to Clause 24(A) of the SEBI (Listing Obligations & Disclosure Requirement) 2015 as amended from time to time, we are enclosing herewith Compliance report dated 30th July, 2020 issued by Mr. Jatin Gupta of M/s Jatin Gupta & Associates, New Delhi, for the year ended March 31st 2020.

Hope you will find the above in order. Kindly acknowledge its receipt.

Thanking you

Yours faithfully
For Samtel India Ltd.



Satish K Kaura
Mg. Director

Encl. As above

Regd. Office: Village Naya Nohra, Kota Baran Road, Kota (Rajasthan)

JATIN GUPTA & ASSOCIATES
COMPANY SECRETARIES

Office : TR-1, Top Floor, Plot No. 3, Anupam Plaza, LSC,
MayurVihar Phase I, Delhi 110 091 (Above Yes Bank Limited)
Ph- +91-11-2275 6338 : E-Mail : jatinfcs@gmail.com

**Secretarial compliance report of Samtel India Limited for the year ended 31st
March, 2020**

I, Jatin Gupta of M/s Jatin Gupta & Associates, Company Secretaries, Delhi have examined:

- (a) documents and records made available to us and explanation provided by Samtel 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, 2020 ("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;~~
- (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;~~
- (g) ~~Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013;~~

JATIN
GUPTA Digitally signed
by JATIN GUPTA
Date: 2020.07.30
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- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And (other regulations as applicable) 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
1	Payment of Annual Listing Fee to the Stock Exchange (BSE) where the equity shares of the company is listed	Company is not regular in payment of Listing Fess.	As informed b5.

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			application for change of RTA was already accepted by NSDL. However, instead of approving the change of RTA, CDSL has blocked the BO Data. Hence, non compliance.
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(b) The entity has maintained records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my examination of those records, amidst ongoing pandemic, since physical visits were curtailed to a minimal level.

(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.
@	@	@	@	@

@ The show cause notices as reported in our last report, management has affirmed no development taking place at regulators end, thus we have nothing to say.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:**nil**

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(Note):

1. *Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations : @*
2. *Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations :@*

E.g. In the report for the year ended 31stMarch, 2021, the PCS shall provide a list of:

- *all the observations in the report for the year ended 31stMar, 2020 along with the actions taken by the listed entity on those observations.*
- *the observations in the reports pertaining to the year ended 31st Mar,2020 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.)*

Place: Delhi
Date: 30.07.2020

Name of the Practicing Company Secretary : Jatin Gupta
FCS No.: 5651
C P No.: 5236
UDIN : F005651B000530329

**JATIN
GUPTA** Digitally signed
by JATIN GUPTA
Date: 2020.07.30
15:38:50 +05'30'
Signature: