

June 30, 2021

To,
The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Bandra-Kurla Complex,
Bandra East, Mumbai- 400 051
Scrip Code: ATCOM

To,
The Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001
Scrip Code- 527007



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

Dear Sir/Madam,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021.

This is for your information and records.

Yours faithfully,
For Atcom Technologies Limited



Vikram Doshi
Managing Director
DIN: 00063455



SANIL DHAYALKAR & Co.

Company Secretary

703/A-Wing, Raunak Tower, Opp. Thane Health
Care Centre, Naupada, Thane (W)-400602

Mobile: 9820251825/email: sadhavalkar@yahoo.com

ANNEX-A

Secretarial Compliance Report of ATCOM TECHNOLOGIES LIMITED **For The Year Ended 31st March 2021**

To,
The Members,
ATCOM TECHNOLOGIES LIMITED
Flat No 5, Sannidhan, Plot No. 145
Indulal D Bhuva Marg, Wadala Mumbai 400031

We have examined

All the documents and records made available to us and explanation provided by **ATCOM TECHNOLOGIES LIMITED** (The Company);

- (i) The filings/submissions made by the listed entity to the stock exchanges
- (ii) Website of the listed entity,
- (iii) Any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31st March 2021** 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”),
- (iv) The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include: -
 - a) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
 - b) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment.
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (‘SEBI Act’):
 - a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



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- 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;

and circulars/guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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:
NA
- 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.

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Particulars	Observations/Remarks of the Practicing Company Secretary
1	<i>Securities And Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>During the period under review the status of the Company under Bombay Stock Exchange Ltd (BSE) and National Stock Exchange of India Ltd (NSE) is "Suspended due to Penal reasons"</i>	<i>The company in compliant with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 on an absolute basis and is regular in submitting its compliances in the year</i>



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			<i>2020-21. It has filed for revocation of its suspension and is currently in process of revoking it.</i>
2	<i>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Letters & Emails received from Bombay Stock Exchange Ltd (BSE) and National Stock Exchange of India Ltd (NSE) for submitting additional documents.</i>	<i>Compliance officer of the company has replied to such Letters & Emails accordingly and no further observations by BSE & NSE.</i>
3	<i>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Letter received from National Stock Exchange (Ref NSE/LIST/ 18011) for non-submission of disclosure in the Annual Report submitted for the year ended 31-Mar-2020- 'Detail of fees paid to the statutory auditor and all entities in the network firm/network entity of which the statutory auditor is a part.'</i>	<i>Company has provided clarification to the exchange that the said information had been inadvertently missed out to be captured in the Corporate Governance section. There has been no further observation from the Exchange.</i>
4	<i>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Letter received from National Stock Exchange (Ref NSE/LISTCOMP/22633) for Clarification - Corporate Governance Report submitted under SEBI (LODR) Regulations, 2015 for the quarter ended June 30, 2020- 'As you are aware that, as per regulation 17, the board of directors of the top 1000 listed entities (with effect from April 1, 2019) and the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.'</i>	<i>Company has provided clarification to the exchange that the Company does not fall under the top 2000 listed entities and hence the compliance under Regulation 17 of having six Directors on the Board is not applicable to them. Still, the Company has adhered to the said Regulation 17 subsequently by having six directors on the Board. There has been no further observation by the Exchange.</i>
5	<i>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>Clarification sought for financial results (quick results) submitted to the Exchange for the quarter ended December 31, 2020- 'Segment details not submitted'</i>	<i>Company has provided clarification to the exchange that segment reporting is not applicable to the Company since there is only one segment. There has been no further observation by the Exchange.</i>



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6	<i>Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015</i>	<i>Maintenance of a Structured Digital Database as required under regulation 3(5) of SEBI (PIT) Regulations, 2015</i>	<i>The Company has maintained the database internally in Excel format with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.</i>
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- 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.
1			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 31 st 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	<i>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015</i>	<i>During the period under review the status of the Company under Bombay Stock Exchange Ltd (BSE) and National Stock Exchange of India Ltd (NSE) is "Suspended due to Penal reasons"</i>	<i>The company is compliant with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 on an absolute basis and is regular in submitting its compliances in the year 2019-20. It has filed for revocation of its suspension and is currently in process of revoking it.</i>	<i>As per the information and explanation provided, the company has submitted its representation and has completed all the necessary formalities for the revocation of its suspension along with submission of all compliances asked for.</i>



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2	Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015	And Letters & Emails received from Bombay Stock Exchange Ltd (BSE) and National Stock Exchange of India Ltd (NSE) for payment of revocation fees & Listing fees	Compliance officer of the company has replied to such Letters & Emails accordingly.	As per the information and explanation provided, the Company has been in continuous dialogue with the Exchange and diligently responded to all the letters & emails received from the Exchanges respectively.
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For Sanil Dhayalkar & Co.,
Company Secretaries

Sadhayalkar



Sanil Dhayalkar
Proprietor
ACS: 31036
COP: 16568

UDIN: A031036C000558035
Date: 30/06/2021
Place: Thane