

May 13, 2024

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, 2024 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, 2024.

This is for your information and records.

Yours Faithfully,  
**For Atcom Technologies Limited**

VIKRAM  
ANANTRAI  
DOSHI  
Date: 2024.05.13  
14:26:24 +05'30'

Digitally signed by  
VIKRAM ANANTRAI  
DOSHI  
Date: 2024.05.13  
14:26:24 +05'30'

**Vikram Doshi**  
Managing Director  
DIN: 00063455

**ATCOM TECHNOLOGIES LIMITED**

CIN: L29299MH1989PLC054224

Regd. Office: Flat No 5, Sannidhan, Plot No. 145 Indulal D Bhuva Marg, Wadala, Mumbai City, Mumbai, Maharashtra, India, 400031

Tel No: 022 35566211 | Email: contact@atcomtech.co.in Website: www.atcomtech.co.in



## SANIL DHAYALKAR & Co.

Company Secretary

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

Mobile: 9820251825/email: [sanil@sdac.co.in](mailto:sanil@sdac.co.in)

### **Secretarial Compliance Report of Atcom Technologies Limited** **For The Year Ended 31<sup>st</sup> March 2024**

To,  
The Members,  
**Atcom Technologies Limited**  
Flat No 5, Sannidhan, Plot No. 145,  
Indulal D Bhuva Marg, Wadala, Mumbai 400031

We M/s Sanil Dhayalkar & Co. Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Atcom Technologies 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,
- (e) to make this Report.

for the financial year ended 31<sup>st</sup> March 2024 (“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 (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the listed entity during the Review Period)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not Applicable to the listed entity during the Review Period)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the listed entity during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat



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- Equity) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period)**  
(f) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities)  
Regulations, 2021 **(Not Applicable to the listed entity during the Review Period)**  
(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,  
2015;  
(h) other regulations as applicable. and circulars/ guidelines issued thereunder;

and based on the above examination, I/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)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
NOT APPLICABLE										

- (b) 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 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE						



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- I. We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/ No/NA)	Observations/ Remarks by PCS*
1.	<b><u>Secretarial Standards:</u></b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	-
2.	<b><u>Adoption and timely updation of the Policies:</u></b> <ul style="list-style-type: none"><li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li></ul>	Yes	-
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"><li>• The listed entity is maintaining a functional website.</li><li>• Timely dissemination of the documents/ information under a separate section on the website.</li><li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website</li></ul>	Yes	-
4.	<b><u>Disqualification of Director(s):</u></b>	Yes	-



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	None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity		
5.	<b><u>Details related to subsidiaries of listed entities have been examined w.r.t.:</u></b>  (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	(a) Yes (b) Yes	-
6.	<b><u>Preservation of Documents:</u></b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	<b><u>Performance Evaluation:</u></b>  The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-
8.	<b><u>Related Party Transactions:</u></b>  (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	(a) Yes (b) NA	Please refer point no. 8(a)
9.	<b><u>Disclosure of events or</u></b>	Yes	-



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	<p><b><u>information:</u></b></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>		
10.	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	-
11.	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder</p>	Yes	-
12.	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	NA	-
13.	<p><b><u>Additional Non-compliances, if any:</u></b></p>	NA	-



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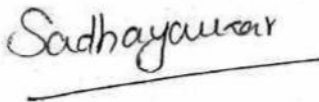
Mobile: 9820251825/email: [sanil@sdac.co.in](mailto:sanil@sdac.co.in)

No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.		
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Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Sanil Dhayalkar & Co.,  
Company Secretaries**



**Sanil Dhayalkar**

**Proprietor**

**ACS: 31036**

**COP: 16568**

**UDIN: A031036F000358506**

**Peer Review Certificate Number: 2796/2022**

**Date: 13/05/2024**

**Place: Thane**