

SIL: SEC: BSE: 2021-22

May 26, 2021

The Secretary BSE Limited P J Towers Dalal Street Mumbai – 400 001

Scrip Code: 540143

Dear Sir

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021.

We are submitting herewith Annual Secretarial Compliance Report for the year ended March 31, 2021 issued by M/s B S S & Associates, Practicing Company Secretary, Hyderabad.

You are requested to take the same on records.

Thanking you

Yours faithfully

for Sagarsoft (India) Limited

J.Raja Reddy Company Secretary



BSS&ASSOCIATES

COMPANY SECRETARIES

Flat No. 5A, Parameswara Apartments, Beside SBI, Anandnagar, Khairatabad, Hyderabad -500 004 Phone : 040 - 40171671, Cell : 6309490217 E-mail : bssass99@gmail.com

> Secretarial Compliance Report of Sagarsoft (India) Limited for the year ended March 31, 2021

We, BSS & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Sagarsoft (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 March 31, 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");

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 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, 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.
- (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) During the Reporting Period, there were no 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.
- (d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

Place: Hyderabad Date: 14-05-2021.

for BSS& Associates, ASSO Company Secretaries 5. Sonikanti. Hyderabad S.Srikanth Partner any Secret M. No.: 22119 C.P. No.: 7999 UDIN.: A022119C000311034