



**SECRETARIAL COMPLIANCE REPORT
OF**

VALIANT COMMUNICATIONS LIMITED FOR THE YEAR ENDED MARCH 31st 2021

(Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 vide SEBI Circular no. CIR/CFD/CMD1/27/2019)

To,
The Board of Directors,
Valiant Communications Limited
71/1, Shivaji Marg, New Delhi - 110015

We Bhalla & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **VALIANT COMMUNICATIONS LIMITED** (CIN: L74899DL1993PLC056652) ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) all other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31st 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 (though the certain Regulations enumerated below are not applicable during the year under reporting) , have been examined, include:

- (a) the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- (d) the Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) the Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) the Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) the Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) the Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (j) the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations , 2009;

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, 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
NOT APPLICABLE			

- (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.
NOT APPLICABLE				



(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

For & on behalf of
Bhalla & Associates

Company Secretaries

FRN: S2010DE424900




Sushant Bhalla

Membership No. A-46640

CP No. :17201

UDIN:- **A046640C000420596**

Place: New Delhi

Date: June 04th 2021