

May 30, 2022

The General Manager
Corporate Relationship Department
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001
BSE Scrip Code: 532712

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051
NSE Symbol: RCOM

Dear Sir,

Sub: Secretarial Compliance Report for the financial year ended March 31, 2022

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith Secretarial Compliance Report for the financial year ended March 31, 2022, issued by M/s. Ashita Kaul & Associates, Practicing Company Secretary.

This is for your information and records.

Thanking you.

Yours faithfully,
For **Reliance Communications Limited**



Rakesh Gupta
Company Secretary

Encl.: as above

(Reliance Communications Limited is under corporate insolvency resolution process pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. With effect from June 28, 2019, its affairs, business and assets are being managed by, and the powers of the board of directors are vested in, the Resolution Professional, Mr. Anish Niranjana Nanavaty, appointed by Hon'ble National Company Law Tribunal, Mumbai Bench, vide order dated June 21, 2019 which was published on the website of the Hon'ble National Company Law Tribunal, Mumbai Bench on June 28, 2019).

Registered Office:

Reliance Communications Limited. H Block, 1st Floor, Dhirubhai Ambani Knowledge City, Navi Mumbai - 400 710
CIN No.: L45309MH2004PLC147531

**Annual Secretarial Compliance Report of Reliance Communications Limited for the
financial year ended 31st March 2022**
**(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations
and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No.
CIR/CFD/CMD1/27/2019 dated 8th February, 2019)**

We, Ashita Kaul & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by **Reliance Communications Limited**("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges: The National Stock Exchange of India ('NSE') and the BSE Ltd. ('BSE').
- (c) Website of the listed entity : <https://www.rcom.co.in>
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended 31st March 2022 ("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 – **Not Applicable**;
- (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**



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Mobile: 9892332128

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to August 12, 2021) and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (w.e.f. August 13, 2021) - **Not applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to August 8, 2021) and Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021 (with effect from August 9, 2021):
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (up to August 8, 2021) and Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021 (with effect from August 9, 2021) - **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and other applicable regulations 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 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	Submission of the Financial Results under Regulation 33 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay of 12 days in approval and submission of unaudited financial results for the quarter and half year ended September 30, 2021	The Company had approved and submitted unaudited financial results for the quarter and half year ended September 30, 2021 on November 27, 2021 with a delay of 12 days as per the timelines of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). The Company had paid fine for such delay to BSE and NSE as per



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			Circular SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020.	no.
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- (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) 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 .N o.	Action taken by	Details of Violation	Details of action taken e.g Fines, Warning Letter, debarment, etc	Observations/remarks of the Practising Company Secretary, if any
1	BSE and NSE	Company had approved and submitted unaudited financial results for the quarter and half year ended September 30, 2021 on November 27, 2021 with a delay of 12 days as per the timelines of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")	Fine for such delay imposed by National Stock Exchange of India Limited and BSE Limited on the Company as per Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020.	The Company had approved and submitted unaudited financial results for the quarter and half year ended September 30, 2021 on November 27, 2021 with a delay of 12 days as per the timelines of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). The Company had paid fine for such delay to BSE Limited and National Stock Exchange of India Limited as per Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January



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				22, 2020.
2	The Securities and Exchange Board of India (SEBI)	The provisions of the SEBI Act, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the SEBI (Prohibition of Fraudulent and Unfair Trade Practices in relation to securities markets) Regulations, 2003	Vide SEBI's Interim Order cum Show Cause Notice dated February 11, 2022 in the matter of Reliance Home Finance Limited, SEBI has restrained Shri Anil D. Ambani, Non-Executive Director and Promoter of the Company, one of the Noticees, from buying, selling, or dealing in securities, either directly or indirectly, in any manner whatsoever until further orders and also from associating with any intermediary registered with SEBI, any listed public company or acting as a	Mr. Anil D. Ambani had tendered his resignation as Director of the Company vide resignation letter dated 15th November, 2019 and same was intimated to Stock Exchanges on 16th November, 2019. Mr. Anil D. Ambani had filed his resignation with Ministry of Corporate Affairs by filing Form DIR-11. Thereafter Committee of Creditors of the Company advised him to continue as Director of the Company under Section 28(1)(j) of the Code and Resolution Professional has filed an application with the Hon'ble National Company Law Tribunal, Mumbai bench against such resignation and the said matter is presently sub judice with the NCLT.



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			director/promoter of any public company which intends to raise money from the public, till further orders.	
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(d) The listed entity has taken the following actions to comply with the observation made in previous reports:

Sr. No.	Observation of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the financial year ended March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Unaudited financial results for the Quarter ended June 30, 2020 and Quarter and half year ended September 30, 2020 pursuant to Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 were filed with Stock Exchanges on October 17, 2020 and 28 th November, 2020 respectively i.e. there was a delay of 31 days for submission of results of the quarter ended June 30, 2020 and a delay of 11 days for submission of results of the quarter	Unaudited financial results for the Quarter ended June 30, 2020 and Quarter and half year ended September 30, 2020, pursuant to Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 were filed with Stock Exchanges on October 17, 2020 and 28 th November, 2020 respectively i.e. there was a delay of 31 days for submission of results of the quarter ended June 30, 2020 and a delay of 11 days for submission of	The Company had paid fine for such delay to BSE Limited and National Stock Exchange of India Limited as per Circular no. SEBI/HO/CF/D/CMD/CIR/P/2020/12 dated January 22, 2020.	The Company has submitted Unaudited financial results for the Quarter ended June 30, 2020 and Quarter and half year ended September 30, 2020, with Stock Exchanges on October 17, 2020 and 28 th November, 2020 respectively i.e. there was a delay of 31 days for submission of results of the quarter ended June 30, 2020 and a delay of 11 days for submission of results of the quarter and half



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and half year ended September 30, 2020.	results of the quarter and half year ended September 30, 2020.	year ended September 30, 2020; and the Company has paid fine for the same to BSE and NSE.
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Date: 20/05/2022

Place: Thane

UDIN: F006988D000325724



For Ashita Kaul & Associates

Company Secretaries

Proprietor

FCS 6988/ CP 6529