

DIGJAM LIMITED

(CIN L17123GJ2015PLC083569)

Secretarial Compliance Report

For the year ended on 31st March 2022



Viral Sanghavi & Associates
Company Secretaries

303, Madhav Plaza, Near Lal Bungalow,
Opp SBI, Jamnagar – 361001, Gujarat, India.
(M) +91 99989 58729 (E) cs.viralsanghavi@gmail.com



**SECRETARIAL COMPLIANCE REPORT
OF
DIGJAM LIMITED
For the Year ended March 31, 2022**

I, CS Viral B Sanghavi, Practicing Company Secretary, have examined:

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

for the year ended March 31, 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;
- (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 (There were no events / instances during the Review Period which attract the applicability of the Regulations);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (There were no events / instances during the Review Period which attract the applicability of the Regulations);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (There were no events / instances during the Review Period which attract the applicability of the Regulations);





- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (There were no events / instances during the Review Period which attract the applicability of the Regulations);
- (h) 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;

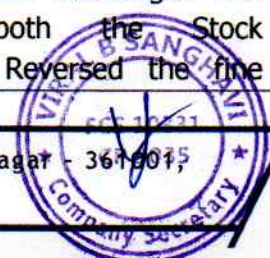
and circulars / guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:

- (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
NIL			

- (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 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.
1.	Stock Exchanges (NSE & BSE)	Non-Compliance of Regulation 6(1) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 – For appoint a qualified company secretary as the compliance officer of the Company.	Operating Procedure with respect to non-compliance of Regulation 6(1) i.e. delay in appointment of qualified company secretary as the compliance officer of the Company, fine was imposed upon the Company by the Exchanges i.e. BSE Limited ('BSE') and The National	The Company had made an application/ Representation for reversal of fine as the Compliance Officer was been appointed by the Board of Directors at their Meeting Held on February 8, 2021 and the information regarding the appointment was also disseminated to both the Stock Exchanges. The Company had represented the same vide its letter dated August 31, 2021 to both the Stock Exchanges and subsequently both the Stock Exchanges has Reversed the fine





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.
			Stock Exchange of India Limited ('NSE') of Rs. 27,140 and Rs. 27,140 respectively by both the Stock Exchanges	levied vide their email dated May 20, 2022 by BSE Limited and Letter dated March 17, 2022 Ref No. NSE/LIST-SOP/REG/REVERSAL/0863 by NSE.

(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 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	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	NSE levied fine of Rs. 1,33,000/- and Rs. 42,000/- respectively for Non-Compliance of the Regulation vide its letter Ref. No. NSE/LIST/SOP/0584 dated September 01, 2020 and Ref. No. NSE/LIST/SOP/DIGJAMLT D dated April 13, 2021.	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	The fine was waived by NSE vide letter dated September 01, 2021, Letter Ref. No. NSE/LIST/SOP/DIGJAMLT D
2	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	NSE levied fine of Rs. 3,04,000/- and Rs. 1,22,000/- respectively for Non-Compliance of the Regulation vide its letter Ref. No. NSE/LIST/SOP/0584 dated September 01, 2020 and Ref. No. NSE/LIST/SOP/DIGJAMLT D dated April 13, 2021.	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	The fine was waived by NSE vide letter dated September 01, 2021, Letter Ref. No. NSE/LIST/SOP/DIGJAMLT D





Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the 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
3	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	NSE levied fine of Rs. 12,50,000/-, 11,90,000/-, 7,35,000/- and 2,65,000/- respectively for Non-Compliance of the Regulation vide its letter Ref. No. NSE/LIST/SOP/0584 dated September 01, 2020 and Ref. No. NSE/LIST/SOP/DIGJAMLTD dated April 13, 2021.	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	The fine was waived by NSE vide letter dated September 01, 2021, Letter Ref. No. NSE/LIST/SOP/DIGJAMLTD
4	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	NSE levied fine of Rs. 1,40,000/- for Non-Compliance of the Regulation vide its letter Ref. No. NSE/LIST/SOP/0584 dated September 01, 2020 and Ref. No. NSE/LIST/SOP/DIGJAMLTD dated April 13, 2021.	The Company has made application/ Representation for waiver of fine before the fine waiver Committee of NSE.	The fine was waived by NSE vide letter dated September 01, 2021, Letter Ref. No. NSE/LIST/SOP/DIGJAMLTD

Disclaimer: This Report is limited to the Statutory Compliances on laws / regulations / guidelines etc. enlisted in this report which have been complied by the Company during the review period. Those due dates were extended by Regulators from time to time due to COVID-19 pandemic and the Company has made compliances within the extended period are considered as compliance in this report. I am not commenting on the Statutory Compliances whose due dates are extended or exemption granted by Regulators due to COVID-19 or still there is time to comply with such compliances.

For, **Viral Sanghavi & Associates**
Company Secretaries



CS Viral B Sanghavi
Proprietor

M. No. FCS 10331, CP 9035
Singed on 30th May, 2022 at Jamnagar
UDIN: F010331D000436372