

## Valiant Communications Limited

(An ISO 9001:2008 and ISO 14001:2004 Certified Company)

Regd. Office : 71/1, Shivaji Marg, New Delhi 110015, India

Corporate Identity No. : L74899 DL1993 PLC056652 | GSTIN : 07 AAACV4250G 1ZJ

T : +91-11-2592 8415, 2592 8416, 2541 0053 | F : + 91-11-2543 4300, 4105 5604

E : admin@valiantcom.com | W : www.valiantcom.com



Date: 22-05-2019

The Deputy General Manager  
Corporate Relationship Department  
BSE Limited, 1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P.J. Towers, Dalal Street, Fort  
Mumbai – 400 001

### Sub: Annual Secretarial Compliance Report

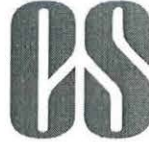
Dear Sir,

In compliance of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Circular Number CIR/CFD/CMD1/27/2019 issued by Securities and Exchange Board of India on 08-02-2019, please find attached herewith the Annual Secretarial Compliance Report, given by a Company Secretary in practice issued in the prescribed form for the year ended 31-03-2019.

You are requested to kindly take the above on record.

By Order of the Board  
For Valiant Communications Limited

  
Manish Kumar  
Company Secretary



**SECRETARIAL COMPLIANCE REPORT  
OF**

**VALIANT COMMUNICATIONS LIMITED FOR THE YEAR ENDED MARCH 31<sup>st</sup> 2019**

(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 31<sup>st</sup> 2019 (“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;
- (j) the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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
<b>NOT APPLICABLE</b>			

- (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.
<b>NOT APPLICABLE</b>				

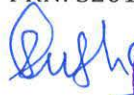



(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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 <sup>st</sup> 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
<b>NOT APPLICABLE</b>				

For & on behalf of  
**Bhalla & Associates**  
Company Secretaries

FRN: S2016DF124900

Sushant Bhalla  
Membership No: A-46640  
CP No. :17201

Place: New Delhi  
Date: May 16<sup>th</sup> 2019