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SHYAM
TELECOM LTD

19th May, 2026

The Manager,
Department of Corporate Services
Bombay Stock Exchange Limited ("BSE")
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400001
Security Code – 517411
Through BSE Listing Centre

Listing Department,
National Stock Exchange of India Limited ("NSE")
Exchange Plaza,
Bandra Kurla Complex
Bandra (E), Mumbai – 400001
Security Symbol – SHYAMTEL
Through NEAPS

Subject: Submission of Annual Secretarial Compliance Report for the financial year ended 31st March, 2026 in accordance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Respected Sir,

In compliance with Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and other relevant circulars, please find enclosed herewith Annual Secretarial Compliance Report dated 7th May, 2026, for the financial year ended 31st March, 2026, issued by M/s A. N. Kukreja & Co., Practicing Company Secretaries.

This is for your information and necessary records.

Thanking you,

Yours faithfully,
For **Shyam Telecom Limited**

Kamini
Company Secretary & Compliance Officer

Enclosure as above

Annual Secretarial Compliance Report of Shyam Telecom Limited
(CIN: L32202RJ1992PLC017750)
For the year ended 31st March 2026 under
Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015

To,
The Board of Directors
Shyam Telecom Limited
Shyam House, No. 3 Amrapali Circle, Vaishali Nagar,
Jaipur, Rajasthan-302021, India

We have examined:

- (a) all the documents and records made available to us and explanation provided by Shyam Telecom 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 31.03.2026 ("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 for the period under report)
- (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 for the period under report)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable for the period under report)
- (f) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (g) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2018; (Not applicable for the period under report)
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable for the period under report)
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and other circulars /guidelines as applicable.

(Note: The aforesaid list of Regulations is only illustrative. The list of all SEBI Regulations, as may be relevant and applicable to the listed entity for the review period, shall be added.)

and based on the above examination, I/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 clauses)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 29(2)/ 29(3) of SEBI (LODR) Regulations, 2015, requiring prior intimation of Board meeting to stock exchange.	Prior intimation of Board meeting to the stock exchange at least 2 working days in advance required. Intimation sent late and hence noncompliance/late compliance...	Late compliance.	BSE and NSE	Notice for non-compliance of Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015 and levy of fine.	BSE and NSE took the view that company was late compliant of the said regulation and imposed fine.	Fine of Rs.10,000 +/- plus GST, was levied by the BSE and NSE separately on the Company for late/non-compliance.	The company has made good the default by making payment of fine to both the stock exchanges on 23.06.2025 and settled the matter.	Management had requested for waiver of the fine. The request of the management was not considered favorably.	None

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: No show cause notice or any issue is pending with Company.

Sr. No.	Observations/Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended. (the years are to be mentioned)	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation/deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	NIL	NIL	NIL	NIL	NIL	NIL

(Note:

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations. NA
2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations. NA

E.g. In the report for the year ended 31st Mar, 2023, the PCS shall provide a list of:

- All the observations in the report for the year ended 31st Mar, 2022 along with the actions taken by the listed entity on those observations.
- The observations in the reports pertaining to the year ended 31st Mar, 2022 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.



(c) I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	None
2.	<u>Adoption and timely updation of the Policies:</u> - All applicable policies under SEBI Regulations are adopted with the approval of the board of directors of the listed entities - All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes	None
3.	<u>Maintenance and disclosures on the Website:</u> - The Listed entity is maintaining a functional website - Timely dissemination of the documents/ information under a separate section on the website - Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes Yes Yes	None
4.	<u>Disqualification of Director:</u> None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013	Yes	None
5.	<u>Details related to Subsidiaries of listed entities:</u> a. Identification of material subsidiary companies b. Requirements with respect to disclosure of material as well as other subsidiaries	NA	The listed entity has no subsidiary/associate or joint venture.
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under the LODR Regulations.	Yes	None
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	None



8.	<u>Related Party Transactions:</u> a. The listed entity has obtained prior approval of Audit Committee for all Related party transactions b. In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.	Yes NA	None No such event occurred.
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of the LODR Regulations within the time limits prescribed thereunder.	Yes	None
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes. See para (a) on page 2.	None
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	None
13.	<u>No additional non-compliances observed:</u> No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes	None

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

**Note: The listed entity has taken required steps/actions and no actions is pending with the listed entity for the year under report or earlier years.*



Assumptions & Limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For A. N Kukreja & Co.
Company Secretaries**



(A.N Kukreja)

Proprietor.

FCS 1070; CP 2318

PR Cert. No. 6458/2025

FRN: S1995DE014900

UDIN: F001070H000296805.

Place: New Delhi

Date: May 7, 2026.