



S. N. ANANTHASUBRAMANIAN & CO
Company Secretaries

10/25-26, 2nd Floor, Brindaban,
Thane (W) - 400 601
T: +91 22 25345648 | +91 22 25432704
E: snaco@snaco.net | W: www.snaco.net
ICSI Unique Code: P1991MH040400

To,
ACCELYA SOLUTIONS INDIA LIMITED
CIN: L74140PN1986PLC041033
Accelya Enclave, 685/2b & 2c,
1st floor, Sharada Arcade,
Satara Road, Pune 411037.

Sir/ Madam,

Annual Secretarial Compliance Report for the Financial Year 2020-21

We have been engaged by **ACCELYA SOLUTIONS INDIA LIMITED** (hereinafter referred to as 'the Company') bearing **CIN: L74140PN1986PLC041033** whose equity shares are listed on BSE Limited and National Stock Exchange of India Limited and to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. The Annual Secretarial Compliance Report is enclosed.

Due to the pandemic caused by COVID-19 and prevailing lockdowns/ restrictions on movement of people imposed by the Government, for the purpose of issuing this report, we have conducted our audit remotely based on the records and information made available to us by the Company electronically.

Annual Secretarial Compliance Report is enclosed.

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Ashwini Vartak
Partner
ACS: 29463 | COP. No.: 16723
ICSI UDIN : A029463C000716215
31st July, 2021 | Thane



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Secretarial Compliance Report of ACCELYA SOLUTIONS INDIA LIMITED
(CIN: L74140PN1986PLC041033)
For the year ended 30th June, 2021

We have examined:

- all the documents and records made available to us and explanation provided by **Accelya Solutions India Limited** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- other documents/ filings, as may be relevant, which has been relied upon to make this certification,

for the year ended **30th June, 2021** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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 there under, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not Applicable as there was no reportable event during the Financial Year under review;**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not applicable as the Company has not bought back / proposes to buy-back any of its securities during the financial year under review;**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable as Company has not issued any shares under ESOP scheme during the financial year under review;**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable as Company has not issued any debt securities during the financial year under review;**

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- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not Applicable as the Company has not issued any Non- Convertible and Redeemable Preference Shares during the Financial Year under review;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
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:- NIL
- (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 my/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: NIL
- (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 30 th June 2020 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Outcome of unaudited financial results for the quarter ended 31 st March 2020 was not intimated within 30 minutes from the conclusion of the board Meeting. Board Meeting was concluded at 4.00 p.m. whereas outcome was intimated to NSE at 6.22 p.m. and BSE at 6.48 p.m due to technical glitches as represented by the Company.	2019-2020	Since then there has been no delay in intimations to be made to exchanges under the said regulation	None

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	Para A of Part A of Schedule III of SEBI (Listing Obligations and Disclosure Requirements)			
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(e) The listed entity has complied with the provisions of Para 6 of Circular No. CIR/CFD/ CMD1/114/2019 issued by SEBI on 18th October, 2019.

For S. N. ANANTHASUBRAMANIAN & CO.
Company Secretaries
ICSI Unique Code P1991MH040400
Peer Review No. 606/2019

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Ashwini Vartak
Partner

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