



CIN: L72300DL1977PLC008782

International Data Management Ltd.

Registered Office : 806, Siddhartha, 96, Nehru Place, New Delhi - 110019,
Tel. : 011-26444812

www.idmlimited.in

June 23, 2021

BSE Limited
P'hirojze Jeejeebhoy Towers
27th Floor, Dalal Street
Mumbai - 400 001

Dear Sirs,

Ref.: File No. I-107

Sub.: Reporting under the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

Please find appended herewith the following:

1. Secretarial Compliance Report under Regulation 24A of the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

We hope you will find the above in order.

Thanking you

For **International Data Management Limited**



Jasbir Singh Marjara
Company Secretary & Compliance Officer
ACS41879

Encl. : As above



Rana & Associates Company Secretaries

H. No. 1183, Opp. Palam Apartments, Bijwasan, New Delhi-110061;
Cell: 9891371429; FRN – S2019DE693800

UDIN: F010333C000377691

SECRETARIAL COMPLIANCE REPORT OF INTERNATIONAL DATA MANAGEMENT LIMITED FOR THE YEAR ENDED 31ST MARCH 2021

To,
The Members,
International Data Management Limited
(CIN: L72300DL1977PLC008782)
806, Siddhartha 96, Nehru Place,
New Delhi - 110019

We Rana & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by **International Data Management Limited** ("the listed entity") and its representatives,
- (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 **31.03.2021** 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)





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Regulations, 2018;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder;

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:

S. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary

(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/our examination of those records.

(c) As informed by the Management, 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:





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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.
NIL				

(d) As informed by the management, 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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, If any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Note: 66,920 no. of shares out of 5,57,045 held by promoters are yet to be dematerialized. The Company is following-up with the remaining promoters for getting their shares in dematerialized form.

FOR RANA & ASSOCIATES
COMPANY SECRETARIES



NISHANT RANA
(Proprietor)
Membership No: F10333
C.P.: 22302

Date: 27.05.2021
Place: New Delhi