

**Annual Secretarial Report of Assam Entrade Limited**  
**For the Financial Year ended 31<sup>st</sup> March, 2020**

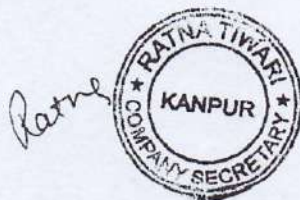
I have examined:

- a) All the documents and records made available to us and explanation provided by Assam Entrade Limited ("the company") having CIN U20219WB1985PLC096557,
  - b) The filings/ submissions made by the company to the stock exchanges,
  - c) Website of the company,
  - d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,
- for the year ended 31<sup>st</sup> March, 2020 in respect of compliance with 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 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011- No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;



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**RATNA TIWARI**  
**Company Secretary**

- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- g. Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013- No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 were not applicable during the period under review;

Based on my above examination and verification of the documents and records produced to me, and according to the information and explanations given to me by the Company, I hereby report that, during the period under review:

- a. The equity shares of the Company are listed on Bombay Stock Exchange on 13<sup>th</sup> Day of January, 2020. The Company has complied with all the provisions of the above Regulations and Circulars / guidelines issued there under 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
1.	Regulation 33(1)(d) of SEBI (LODR), 2015  The listed entity shall ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis	The Limited Review Report submitted to Bombay Stock Exchange for the quarter ended 31 <sup>st</sup> December, 2019 has been signed by the Auditors who does not hold a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India	The Company has informed us that The Limited Review Report was signed on 11 <sup>th</sup> Day of January, 2020 i.e before the effective Date of Listing on Bombay Stock Exchange. Therefore, the said provisions were not



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are to be given only by an auditor who has subjected himself to the peer review process of Institute of Chartered Accountants of India and holds a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India.		applicable on the Company as on the date of signing the report.
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- b. The company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- c. There were no instances for actions to be taken against the Company/ 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 the Action taken, Eg., fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary
	Nil	Nil	Nil	Nil

- d. The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.

Sr. No.	Observations 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)	Actions taken by the listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Not Applicable	Not Applicable	Not Applicable	Not Applicable



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**Company Secretary**

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e. The company has complied with para 6(A) and 6(B) of the SEBI Circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Disclaimer: "Verification of documents has been conducted virtually due to Covid-19 pandemic. This certificate is issued on the basis of information provided by the company through electronic mode and verified with requirements. "

*Ratna  
Tiwari*



(CS Ratna Tiwari)  
Practising Company Secretary  
M. NO. : A51400  
C.P. No: 19765  
UDIN: A051400B000422386

Date: 07.07.2020

Place: Kanpur

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