

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

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**Annual Secretarial Compliance Report of Assam Entrade Limited**  
**For the Financial Year ended 31<sup>st</sup> March, 2021**

I have examined:

- a) All the documents and records made available to us and explanation provided by Assam Entrade Limited ("the company") having CIN L20219WB1985PLC096557,
- 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, 2021 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;
- 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 to the Company during the Audit Period;
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - Not Applicable to the Company during the Audit Period;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - Not Applicable to the Company during the Audit Period;
- g. Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013- Not Applicable to the Company during the Audit Period;
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. Any circular/guidelines issued thereunder;

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:



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**Address: F-3, First Floor, Siddharth**

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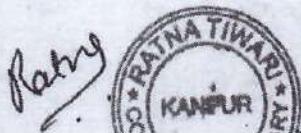
- a. The Company has complied with all the provisions of the above Regulations and Circulars / guidelines issued thereunder except in respect of matters specified below:

| Sr. No. | Compliance Requirement (Regulations/ circulars / guidelines including specific clause)   | Deviations   | Observations/ Remarks of the Practicing Company Secretary  |
|---------|--|--|--|
| 1.      | Regulation 33(1)(d) of SEBI (LODR), 2015<br><br>The listed entity shall ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis 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. | The Limited Review Reports and Audit Reports submitted to the stock exchange on a quarterly or annual basis are given by the Statutory Auditor 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 that the equity shares of the Company were listed on BSE w.e.f 13 <sup>th</sup> January, 2020 and The Audit Report and the Limited Review Report for the quarter and year ending 31 <sup>st</sup> March, 2020 was signed by the continuing Auditor.<br>During 2020-2021, due to ongoing Covid-19 pandemic, the Company could not change its Auditors and as of now the Company is in the process of change in Auditors of the Company as per the requirement of Regulation 33(1)(d) of SEBI (LODR), 2015. |

- 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



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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 31.03.2020  | Actions taken by the listed Entity, if any   | Comments of the Practicing Company Secretary on the actions taken by the listed entity   |
|---------|---|---|--|--|
| 1.      | <p>Regulation 33(1)(d) of SEBI (LODR), 2015</p> <p>The listed entity shall ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis 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.</p> | <p>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</p> | <p>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 applicable on the Company as on the date of signing the report</p> | <p>The Equity shares of the Company were listed on BSE w.e.f. 13<sup>th</sup> January, 2020. Therefore, the said provisions were not applicable on the Company as on the date of signing the report.</p> |

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  
Practicing Company Secretary  
M.NO : A51400  
C.P. No: 19765  
UDIN: A051400C000528580

Date: 28/06/2021  
Place: Kanpur

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