



**Sachin Thakkar & Associates**  
**Company Secretaries**

(A peer reviewed firm)

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**Secretarial Compliance Report of Assam Entrade Limited**  
**For the Financial Year ended 31<sup>st</sup> March, 2022**

To,  
The Board of Directors,  
Assam Entrade Limited  
CIN: L20219WB1985PLC096557  
16, Tara Chand Dutta Street  
2ND FLOOR KOLKATA -700073

We, Sachin Thakkar & Associates, Practicing Company Secretaries, have examined:

- All the documents and records made available to us and explanation provided by Assam Entrade Limited ("the company") having CIN L20219WB1985PLC096557,
- The filings/ submissions made by the company to the stock exchanges,
- Website of the company,
- 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, 2022 ("Review Period") in respect of compliance with 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 thereunder have been examined include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not Applicable to the Company during the Review Period;**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable to the Company during the Review Period;**
- The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12th August, 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021) - **Not Applicable to the company during the Review Period;**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (upto 16<sup>th</sup> August, 2021) - **Not Applicable to the Company during the Review Period;**

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- g. Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013 (upto 16<sup>th</sup> August, 2021) - **Not Applicable to the Company during the Review Period;**
- h. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August 2021) - **Not Applicable to the Company during the Review Period);**
- i. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015; to the extent applicable
- j. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, to the extent applicable;
- k. The Depositories Act, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable,
- and circular/guidelines issued thereunder;

and based on my above examination and considering the relaxations granted by Ministry of Corporate Affairs and Securities and Exchange Board of India on account of Covid -19 pandemic, We hereby report that, during the period under review:

- 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  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 Statutory Auditors have informed the Company that process of peer review in the Auditor's firm as per the ICAI guidelines is near to completion and soon the Auditor Firm shall be peer review compliant.  Further, The Company informed that keeping in view the lengthy procedure involved in change in auditors, Company decided to continue with the present auditors.



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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 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
1.	SEBI	Non Compliance with Reg. 27(2)-Corporate Governance Report for 31 <sup>st</sup> March, 2020	Fine amounting to Rs. 44,840/- as per SEBI SOP Circular dated May 03, 2018	The Company has paid fine amounting to Rs. 44,840/- and the Company has filed CG Report for March 31, 2020 on 06 <sup>th</sup> September, 2020.

- 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	Actions taken by the listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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 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.	<b>For the year ended 31.03.2020:</b> 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.	<b>For the year ended 31.03.2020:</b> 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.	<b>For the year ended 31.03.2020:</b> 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.



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2.	Regulation 33(1)(d) of SEBI (LODR), 2015	For the year ended 31.03.2021:	For the year ended 31.03.2021:	For the year ended 31.03.2021
	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.	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.  The Audit Report and the Limited Review Report for the quarter and year ending 31 <sup>st</sup> March, 2021 was signed by the continuing Auditor.	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. 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.

Further, during the review period Statutory Auditors has not resigned from the Company so the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of resignation of statutory auditor shall not be applicable.

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

**FOR SACHIN THAKKAR & ASSOCIATES,**  
**Company Secretaries,**  
**ICSI Unique Code No.: I2016GJ1394400**  
**Peer review certificate No. 2163/2022**

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**Sachin Thakkar**  
**Proprietor**  
**Mem. No. F11396**  
**C.P. No. 15881**  
**UDIN: F011396D000431717**

**Date: 30/05/2022**  
**Place: Ahmedabad**