

ASSAM ENTRADE LIMITED

Regd. Office: 16 Tara Chand Dutta Street (2nd Floor), Kolkata 700 073

CIN No. L20219WB1985PLC096557

GSTIN 09AAECA3423G1ZZ

PAN NO. AAECA3423G

Date: May 26, 2023

To,
The Manager Listing
BSE Limited
5th Floor, P.J. Towers,
Dalal Street,
Mumbai-400 001
Scrip Code: 542911

Subject: Submission of Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

In Compliance to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with the SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith the Secretarial Compliance Report for the financial year ended March 31, 2023 issued by Ms. Ratna Tiwari, Practicing Company Secretary, in the format prescribed under said circular.

You are requested to take the above information in your records.

Thanking You.

For and on behalf of
Assam Entrade Limited

ANUJ
GUPTA

Digitally signed
by ANUJ GUPTA
Date:
2023.05.26
17:39:47 +05'30'

Anuj Gupta
Company Secretary and Compliance Officer

Place: Kanpur

Corp. Office : 26/49, Birhana Road, Kanpur 208 001
Phone: 0512-23500151 eMail: assamentrade1985@gmail.com
www.assamentrade.com

SECRETARIAL COMPLIANCE REPORT OF ASSAM ENTRADE LIMITED

FOR THE YEAR ENDED 31ST MARCH, 2023

[Pursuant To Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors,
Assam Entrade Limited
16, Tara Chand Dutta Street,
Kolkata-700073

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Assam Entrade Limited**, having its Registered Office at **16, Tara Chand Dutta Street, 2nd Floor Kolkata – 700073**, Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and return filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, have examined:

- a) all the documents and records made available to us and explanation provided by **Assam Entrade Limited** ("the listed entity") having CIN: L20219WB1985PLC096557,
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed company,



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d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended 31st March, 2023 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; as amended from time to time;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the Company during the period under review);
- d) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the period under review);
- e) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the Company during the period under review);
- f) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



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g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the Company during the period under review);

h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; as amended from time to time;

i) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client and;

j) The Depositories Act, 1996 and the Regulations and bye-laws framed thereunder and based on the above examination,

We hereby report that, during the period under review, the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standard:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	



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RATNA TIWARI**Company Secretary**

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3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none">• The Listed entity is maintaining a functional website• Timely dissemination of the documents/information under a separate section on the website• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	
4.	<u>Disqualification of Director:</u> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	
5.	<u>To examine details related to Subsidiaries of listed entities:</u> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	N.A	There were no Material Subsidiary Companies of the Company during the period under review.
6.	<u>Preservation of Documents:</u> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival Policy prescribed under SEBI LODR Regulations, 2015</p>	Yes	

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7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes NA	The listed entity has obtained prior approval of Audit Committee for all Related party transactions.
9	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	Yes	
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	



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11	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>Yes, regarding non-compliance with Regulation 27(2) of SEBI (LODR) Regulations, 2015 in submission of corporate governance report for quarter ended 31st March, 2022.</p>	Yes	<p>The Company was in receipt of letter on May 9th, 2022 as per SEBI circular no. SEBI/HO/CF D/CMD/CIR/P/2020/12 dated January 22, 2020 in which SEBI has imposed the penalty on the company for non-compliance of certain provisions of SEBI during submission of Corporate Governance Report as per (Regulation 27(2) of SEBI (LODR), 2015. Company had submitted its response</p>
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		stating that it was inadvertent typo error and the revised copy of Corporate Governance report was submitted to BSE listing Centre on the same day i.e. May 09, 2022. Further, company made request on May 24, 2022 to waive off the fine being imposed on the company as per SEBI circular no. SEBI/HO/CF D/CMD/CIR/P/2020/12 dated January 22, 2020 and paid the processing fees for filing waiver
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			application dated June 08, 2022. No action has further been taken by SEBI.
12	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Not applicable	Not applicable

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/	NA	The Reporting of Clause 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18 th October, 2019 regarding 'Resignation of Statutory Auditors' from listed entities is not applicable as there was no



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	audit report for the last quarter of such financial year as well as the audit report for such financial year.		resignation of the Statutory Auditors in the Company during the period under review.
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information/non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed</p>	NA	<p>The Reporting of 'Clause 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/14/2019 dated 18th October, 2019 regarding 'Resignation of Statutory Auditors' from listed entity is not applicable as there was no resignation of the Statutory Auditors in the Company during the period under review.</p>



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	<p>the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information:</p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
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We hereby further report that, during the year under review:

- 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:

Sr. No.	Compliance Requirements (Regulations/circulars/guidelines including specific clause)	Regulation /Circular No.	Deviation	Type of Action	Details of Violation	Observation/Remarks of Practicing Company Secretary	Management Response	Remarks
1.	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	Regulation 33(1) (d) of SEBI (LODR), 2015.	Limited Review report submitted to BSE Limited for the quarter ended 30 th June, 2022 has been signed by the Auditors who does not hold a valid certificate issued by the			The Statutory Auditors has obtained peer review certificate on August 03, 2022. Henceforth, the Company has complied with Regulation 33(1) (d) of SEBI (LODR), 2015. Further, Limited	The Company has obtained compliance certificate with the Regulation 33(1) (d) of SEBI (LODR), 2015.	Acknowledged.



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Of India (ICAI) and holds a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI).		Peer Review board of the Institute of Chartered Accountants of India (ICAI).			Review Reports for further quarters were signed by the Auditor who has obtained Peer Review Certificate from Institute of Chartered Accountant of India (ICAI).		
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b) This listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response.	Remarks
1	Non-Compliance with Regulation	Regulation 27(2) of	Delay in submission	Securities and Excha	Fine	Delay in submission	Fine of Rs.44,840/- Was levied by the	Company had paid the fine and had	Company had paid	



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27(2)- Corporate Governance Report for 31 st March, 2020.	SEBI (LOD- R), 2015.	of Corpo- -rate Govern- ance Report for the quarte- -r ended on March , 2020,	-nge Boar- d of India (SEBI).		of Corpo- rate Govern- ance Report for the quarte- -r ended on March, 2020.	Securities Exchange Board India (SEBI).	submitted Corporate Governan- ce Report for the quarter March, 2020 on September 6 th , 2020.	the fine and had subm- -itted Corp- orate Gove- rnanc- e Repor- t for the quart- er Marc- h, 2020 on Septe- mber 6 th , 2020.	
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2	To ensure that the limited review or audit reports submitted to the stock exchange(s) on a quarterly or annual basis should be given only by an auditor who has subjected himself to the peer review process of Institute of Chartered Accountants of India (ICAI) and holds a valid certificate issued by the Peer Review Board of the ICAI.	Regulation 33(1)(d) of SEBI (LODR), 2015	Audit Report submitted to the stock exchange for the year ended on 31/03/2022 are given by the statutory auditor who does not hold a valid certificate issued by the Peer Review board			Non-compliance of Regulation 33(1)(d) of SEBI (LODR), 2015.		The Statutory Auditors have informed the company that process of Peer Review in Auditor's firm as per ICAI guidelines is near completion soon the Auditor firm shall be Peer review compliant.	Company rectified the non-compliance during the FY 2022-23
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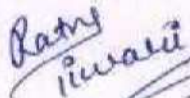
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			of Institu te of Charte red Accou ntants of India (ICAI).							
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Assumptions and Limitation of scope and review:-

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.



CS Ratna Tiwari
Practicing Company Secretary
M. No.: A51400
C.P. No.: 19765
UDIN: A051400E000379904

Date: 25.05.2023

Place: Kanpur

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