

# **ASSAM ENTRADE LIMITED**

Regd.Office: 16 Tara Chand Dutta Street (2<sup>nd</sup> Floor), Kolkata 700073

CIN No. L20219WB1985PLC096557

GSTIN 09AAECA3423G1ZZ

PAN NO. AAECA3423G

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**Date: May 23, 2024**

To,  
The Manager Listing  
**BSE Limited**  
5<sup>th</sup> Floor, P.J. Towers,  
Dalal Street,  
Mumbai-400 001

**Scrip Code: 542911**

**Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2024.**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March, 2024 issued by M/s. Shivam Grover & Associates, Company Secretaries.

This is for your information and records.

For and on behalf of  
**Assam Entrade Limited**

**Ayushi Bajaj**  
**Company Secretary and Compliance Officer**

**Encl.: a/a**



**SECRETARIAL COMPLIANCE REPORT OF ASSAM ENTRADE LIMITED  
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024**

**(Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)**

To,  
The Board of Directors  
**ASSAM ENTRADE LIMITED**  
16 Tara Chand Dutta Street  
2nd Floor Kolkata West Bengal  
India 700073

We have conducted the Secretarial review of the compliance of the applicable statutory provisions, as mentioned hereinbelow and the adherence to corporate practices adopted by **ASSAM ENTRADE LIMITED** (hereinafter referred as 'the listed entity'), in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained and the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We Shivam Grover & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **ASSAM ENTRADE LIMITED** ("the listed entity"),
- (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 financial year ended March 31, 2024 ("Review Period") 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) Regulations, 2018; **Not Applicable during the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the period under review**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable during the period under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;

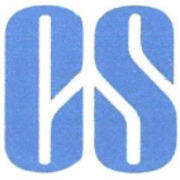
We hereby report that, during the Review Period:

- (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:

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 Practising Company Secretary	Management Response	Remarks
Not Applicable during the period under review.										



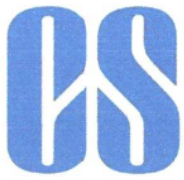




(a) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations / Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments on the actions taken by the listed entity
1.	Non-Compliance with Regulation 27(2) of SEBI (LODR) Regulation, 2015 in submission of Corporate Governance report for quarter ended March 31, 2022	March 31, 2023	Regulation 27(2) of SEBI (LODR) Regulation, 2015	The Company was in receipt of letter on May 9, 2022 as per SEBI Circular No. SEBI/HO/CFD/CM D/CIR/P/2020/12 Dated January 22, 2020 in which SEBI has imposed the penalty of Rs 44,840/- 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) Regulation, 2015.	Company had submitted its response 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 9, 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/CFD/CMD/CI R/P/2020/12 dated January 22, 2020 and paid the processing fees for filing waiver application dated June 08, 2022.No action has further been taken by SEBI.	Company has submitted its response 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 9, 2022.
2.	Limited Review report submitted to BSE Limited for the quarter ended June 30, 2022 has been	March 31, 2023	Regulation 33(1) of SEBI (LODR) Regulation, 2015	Limited Review report submitted to BSE Limited for the quarter ended June 30, 2022 has been signed by	The Statutory Auditors has obtained peer review certificate on August 03, 2022. Henceforth, the company has	The Statutory Auditors has obtained peer review certificate on August 03, 2022. Henceforth,





	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 (ICAI)			the Auditors who does not hold a valid certificate issued by the Peer Review board of the Institute of Chartered Accountants of India (ICAI)	complied with Regulation 33(1) of SEBI (LODR) Regulation, 2015. Further Limited Review reports for further quarters were signed by the Auditor who has obtained Peer Review Certificate from Institute of Chartered Accountants of India (ICAI)	the company has complied with Regulation 33(1) of SEBI (LODR) Regulation, 2015.
3.	Audit Report submitted to BSE Limited for the year ended March 31, 2022 has been signed by the Statutory Auditors who does not hold a valid certificate issued by the Peer Review board of the Institute of Chartered Accountants of India (ICAI)	March 31, 2022	Regulation 33(1)(d) of SEBI (LODR) Regulation, 2015	Audit Report submitted to BSE Limited for the year ended March 31, 2022 has been signed by the Statutory Auditors who does not hold a valid certificate issued by the Peer Review board of the Institute of Chartered Accountants of India (ICAI)	The Statutory Auditors have informed the company that process of Peer Review in Auditors Firm as per ICAI guidelines is near completion on soon the Auditor firm shall be Peer Review compliant.	Company rectified the Non-Compliance during the FY 2022-2023
4.	Non-Compliance with Regulation 27(2) of SEBI (LODR) Regulation, 2015	March 31, 2020	Regulation 27(2) of SEBI (LODR) Regulation, 2015	Delay in submission of Corporate Governance report for quarter ended March 31, 2020	Fine of Rs 44,840/- was levied by the Securities and Exchange Board of India and Company had paid the fine and also submitted Corporate Governance report for quarter ended March 31, 2020 on September 06, 2020.	Company had paid the fine and also submitted Corporate Governance report for quarter ended March 31, 2020 on September 06, 2020.





We have examined the compliance of above regulations, circulars, guidelines issued thereunder as applicable during the period under review and based on the confirmations received from management of the Company as and wherever required, the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2	<b>Adoption and timely updating of the Policies:</b>  i. All applicable policies under SEBI regulations are adopted with the approval of board of directors of the listed entities  ii. All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	
3	<b>Maintenance and disclosures on Website:</b>  i. The Listed entity is maintaining a functional website.  ii. Timely dissemination of the documents/ information under a separate section on the website.  iii. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website.	Yes	
4	<b>Disqualification of Director:</b>  None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	







5	<b>Details related to Subsidiaries of listed entities have been examined w.r.t:</b>  (a) Identification of material subsidiary companies.  (b) Disclosure requirement of material as well as other subsidiaries	NA	There were no material subsidiary companies of the company during the period under review.
6	<b>Preservation of Documents:</b>  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.	Yes	
7	<b>Performance Evaluation:</b>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	
	(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	NA	During the year under review, all the related party transactions occurred with the prior approval of the Audit Committee of the Company.
9	<b>Disclosure of events or information:</b>  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	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	NA	
12	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	
13	<b>Additional non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	

#### 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

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the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to financial year ended March 31, 2024.

5. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

For Shivam Grover & Associates  
Company Secretaries



CS Shivam Grover  
Membership No. A63633  
Certificate of Practice No. 24898  
Peer Review Certificate No. 3057/2023  
UDIN: A063633F000430252

Date: May 23, 2024  
Place: Delhi