

MAA JAGDAMBE TRADELINKS LIMITED

CIN: L74999MH1985PLC035104

Registered Office: Shop No. 7, Ground Floor, A Wing, Navkar Building,

Yashwant Gaurav Complex, Nalasopara (West), Palghar - 401 203.

Tel: 8655121144, **Email:** maajagdambetradelinksltd@gmail.com, **Website:** www.maajtl.com

Date: 30th May, 2024

To,
BSE Limited
Corporate Relation Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001.

Script Code: 511082

Sub.: Submission of Annual Secretarial Compliance Report under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 for the year ended 31st March, 2024

Dear Sir / Madam,

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are enclosing herewith Annual Secretarial Compliance Report of the Company issued by M/s. Abhilasha Chaudhary & Associates, Practicing Company Secretary, Mumbai for the year ended 31st March, 2024.

Kindly take the same on your records.

Thanking you.
Yours faithfully,

For Maa Jagdambe Tradelinks Limited

Harish Kanta Srivastava
DIN: 06874778
Director

Encl.: as above



To
The Board of Directors
MAA JAGDAMBE TRADELINKS LIMITED.
Shop No. 7, Ground Floor, A Wing, Navkar Building,
Yashwant Gaurav Complex, Nalasopara (West), Thane,
Palghar, Maharashtra, India, 401203.

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2023-24.

I have been engaged by MAA JAGDAMBE TRADELINKS LIMITED. (hereinafter referred to as "the Company") bearing CIN: L74999MH1985PLC035104 whose equity shares listed on **Bombay Stock exchange** (Currently suspended for trading) to conduct audit in terms of Regulations 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with **SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019** and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the Company to maintains records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/ guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Abhilasha Chaudhary & Associates
Practicing Company Secretary

Abhilasha Chaudhary, Proprietor
Membership No: 62496
CP No: 23604



UDIN: A062496F000500098

Date: 30th May, 2024





SECRETARIAL COMPLIANCE REPORT OF MAA JAGDAMBE TRADELINKS LIMITED.
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

To,
Board of Directors,
MAA JAGDAMBE TRADELINKS LIMITED.
Shop No. 7, Ground Floor, A Wing, Navkar Building,
Yashwant Gaurav Complex, Nalasopara (Wes, t), Thane,
Palghar, Maharashtra, India, 401203.

We have examined

- (a) All the documents and records made available to us and explanation provided by **M/s. Maa Jagdambe Tradelinks Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, (Website is not working)
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended **March 31, 2024** in respect of compliance with the provisions of:

- (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, Notification and 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, 2009 & Thereafter 2018. **Not applicable to the Company during the audit period;**
- (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 and Sweat Equity) Regulations, 2021; **Not applicable to the Company during the audit period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars/ guidelines issued there under;

and based on the above examination, we hereby report that, during the Review Period the securities of the company are suspended on BSE Ltd. since 2015 and the shares are not tradable on the stock exchange during the entire audit period the company status is suspended on BSE Ltd.:





(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.	Action taken by	Details of Non-compliance	Details of action taken	Remarks by PCS, if any
1	BSE Ltd.	Regulation 76 of the SEBI (DP) Regulations, 2015: Submission of Reconciliation of Share Capital Audit Report	Delay in submission of Reconciliation of Share Capital Audit Report (both in pdf and xbrl) for the quarter ended 31.03.2023, 30.06.2023, 30.09.2023 and 31.12.2023	There is delay in submission of Reconciliation of Share Capital Audit Report (both in pdf and xbrl) for the quarter ended 31.03.2023, 30.06.2023, 30.09.2023 and 31.12.2023
2	BSE Ltd.	Regulation 7(3) of the SEBI (LODR) Regulations, 2015: Submission of Compliance Certificate	Delay in submission of Compliance Certificate for the year ended 31.03.2023 and 31.03.2024	There is Delay in submission of Compliance Certificate for the year ended 31.03.2023 and 31.03.2024
3.	BSE Ltd.	Regulation 40(9) of the SEBI (LODR) Regulations, 2015: Submission of Certificate	Delay in submission of Certificate for the year ended 31.03.2023 and 31.03.2024	There is Delay in submission of Certificate for the year ended 31.03.2023 and 31.03.2024
4.	BSE Ltd.	Regulation 6(1) of the SEBI (LODR) Regulation 2015: Appointment of Company Secretary cum Compliance Officer	The previous company secretary cum compliance officer resigned w.e.f 03 rd July, 2020 and still not yet appointed	Non-Compliance under regulation 6(1) of SEBI (LODR) Regulation, 2015 appointment of Company Secretary cum compliance officer
5.	BSE Ltd.	Regulation 17 of the SEBI (LODR) Regulation 2015: Composition of Board of Directors	The Board Composition is not as per the provisions of Regulation 17 of the SEBI (LODR) Regulation 2015	The Board Composition is not as per the provisions of Regulation 17 of the SEBI (LODR) Regulation 2015
6.	BSE Ltd.	Sub-regulation 2 of Regulation 26A of the SEBI (LODR) Regulation 2015: Vacancy in the office of Chief Financial Officer	The Company has not appointed CFO after resignation of previous CFO w.e.f 27 th May, 2022.	Vacancy in the office of the Chief Financial Officer is not filled up by the Company till date.
7.	BSE Ltd.	Regulation 47(1) of the SEBI (LODR) Regulations, 2015: Publication of the financial results in newspapers	The Company has not published the financial results of the Company in newspapers.	The Company has not published the financial results of the Company in newspapers.

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





Sr. No.	Observations of PCS in previous reports	Actions taken by listed entity, if any	Comments of the PCS on the actions taken by the listed entity
1	BSE Ltd.	Non-compliance under regulation 76(1) 31.03.2023 both PDF & Excel	Non-Compliance under regulation 76(1) 31.03.2023 both PDF & XBRL
2	BSE Ltd.	Non-compliance under regulation 40(10) for the 31.03.2023	Non-compliance under regulation 40(10) for the 31.03.2023
3	BSE Ltd.	Regulation 6(1) of SEBI (LODR) Regulation 2015 appointment of company secretary cum compliance officer	Non Compliance under regulation 6(1) of SEBI (LODR) Regulation, 2015 appointment of Company Secretary cum compliance officer
4	BSE Ltd.	Regulation 47(1) of SEBI (LODR) Regulations, 2015 the listed entity shall publish the financial result in the newspaper	Non Compliance under regulation 47(1) of SEBI (LODR) Regulations, 2015
5.	BSE Ltd.	Appointment of CFO	The company has not appointed CFO after resignation of previous CFO w.e.f 27 th May, 2022.

The additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of the BSE Circular reference No. 20230410-41 dated; April 10, 2023, are given in the attached Annexure.

Annexure

Additional affirmations by Practicing Company Secretary (PCS) in Annual Secretarial Compliance (ASCR) in terms of BSE Circular reference no. 20230410-41 dated: April 10, 2023

Sr. No.	Particulars	Compliance Status Yes/No/NA	Remarks by PCS
1.	Secretarial Standards: The Compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the ICSI, as notified by the CG under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Satisfactory
2.	Adoption and timely Up-dation of		





	the Policies: 1. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities 2. 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 Yes	Satisfactory
3.	Maintenance and disclosures on Website: - 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 re-directs to the relevant document(s)/ section of the website	NO	Website is not functional
4.	Disqualification of Director: 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	Satisfactory
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a). Identification of material subsidiary companies b). Disclosure requirement of material as well as other subsidiaries	NA	There is no subsidiary of the company.
6.	Preservation of Documents: 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	Satisfactory
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every	Yes	Satisfactory





	financial year/during the financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions: a). The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b). The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	Satisfactory No such cases observed
9.	Disclosure of events or information: 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.	NA	Satisfactory
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	Company is not complied with the requirements of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 with respect to making entries in the SDD Software during the Audit Period.
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 except as provided under separate paragraph herein (**).	Yes	The securities of the Company is already suspended on BSE Ltd. and there the SOP fines not been imposed on the company by BSE Ltd. however the company is in non-compliance of Delay submission of quarterly/half yearly/ yearly compliances with the BSE Ltd. as per the SEBI LODR Regulations 2015 for the quarter ended March, 2023, June, 2023 September, 2023 & December, 2023.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. s





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:**

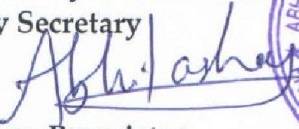
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>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</p> <p>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/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA NA NA	No such cases were observed during the review period.
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 the Audit Committee the details of</p>	NA	No such cases were observed during the review period.





	<p>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: 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>	NA	No such cases were observed during the review period.
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such cases were observed during the review period.

For Abhilasha Chaudhary & Associates
Practicing Company Secretary


Abhilasha Chaudhary, Proprietor
Membership No: 62496
CP No: 23604



UDIN: A062496F000500098
Date: 30th May, 2024

