



Regd. Office: OFFICE ADDRESS: 801-A, 8TH FLOOR, MAHALAYA COMPLEX,
OPP: HOTEL PRESIDENT, B/H. FAIRDEAL HOUSE,
SWASTIK CROSS ROADS, OFF: C.G.ROAD,
NAVRANGPURA, AHMEDABAD: 380 009. **Tel:**30025866
E-Mail: orient.tradelink@gmail.com, Website: www.orienttradelink.in

Date: 29.05.2024

To,
Department of Corporate Services
BSE Limited,
Phiroze Jeejeebhoy Towers,
28th Floor, Dalal Street, Fort,
Mumbai – 400001

Company Symbol: ORIENTTR
Script Code: 531512

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

Dear Sir/Madam,

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015, we are submitting herewith Annual Secretarial Compliance Report for the financial year ended 31st March, 2024 of the Company issued by Practicing Company Secretary.

You are requested to take the above on your records and do the needful.

Thanking you,

Yours faithfully,

For and on behalf of
Orient Tradelink Limited

AUSHIM
KHETARPAL Digitally signed by
AUSHIM KHETARPAL
Date: 2024.05.29
15:42:37 +05'30'

Aushim Khetarpal
Managing Director/ CFO
DIN: 00060319

Encl: As above

ORIENT TRADELINK LIMITED

CIN: L65910GJ1994PLC022833
Corporate Office: 141 - A. Ground Floor,
Shahpur Jat Village, New Delhi-110049. Tel: 9999313918



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF ORIENT TRADELINK LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2024**

We Vikas Verma & Associates, Whole Time Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **ORIENT TRADELINK 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 year ended 31st March, 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 for the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable for the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable for the period under review)**

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Firm Registration No: - **P2012DE081400**, Udyog Aadhaar Number: - **DL03D0019626**

GST No.: - **07AAOFV2342L1ZR**, Peer Review Certificate No. **899/2020**

Off. No.: - 011 43029809, +91 9953573236

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- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable for the period under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and circulars/guidelines issued thereunder;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

And based on the above examination, we hereby report that, during the Period under Review:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder:

I/ we hereby report that, during the Review Period the Compliance status of the listed entity is appended as below:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: 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.	<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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3.	<p><u>Maintenance and disclosures on Website:</u></p> <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 re-directs to the relevant document(s)/ section of the website. 	YES	-
4.	<p><u>Disqualification of Director:</u></p> <ul style="list-style-type: none"> • None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013. 	YES	-
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <ul style="list-style-type: none"> • Identification of material subsidiary companies. • Requirements with respect to disclosure of material as well as other subsidiaries. 	(Not Applicable for the period under review)	-
6.	<p><u>Preservation of Documents:</u></p> <ul style="list-style-type: none"> • 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.	<p><u>Performance Evaluation:</u></p> <p>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.</p>	YES	-

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8.	<p><u>Related Party Transactions:</u></p> <ul style="list-style-type: none"> • The listed entity has obtained prior approval of Audit Committee for all Related party transactions. • 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	-
9.	<p><u>Disclosure of events or information:</u></p> <ul style="list-style-type: none"> • 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.	<p><u>Prohibition of Insider Trading:</u></p> <ul style="list-style-type: none"> • The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 	YES	-
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <ul style="list-style-type: none"> • No Actions 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. 	Not Applicable	
12	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the</p>	(Not Applicable for the period under review)	-

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	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.		
13	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	Details for the Non-Compliances are given under the Table (a)

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)	Observation/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/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	
2.	Other conditions relating to resignation of statutory auditor		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a) In case of any concern with the management of the listed entity/material subsidiary such as	NA	

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	<p>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 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>		
<p>3.</p>	<p>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.</p>	<p>NA</p>	<p>-</p>

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TABLE-I

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 (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Statement of Deviation(s) or variations(s)	Regulation 32 of the Securities and Exchange Board of India (LODR) Regulations, 2015.	Delay in filing Statement of Deviation or variation Report for the quarter ended March 2023.	-	-	-	-	Statement of Deviation shall be filed on the same day of filing Financial Results which was 29.05.2023. However, the same was submitted on 03th June, 2023.	Management has a view that as there was no deviation in the fund so raised therefore there was no requirement of filing the same. But lately management file the same for good governance.	-
2.	Related Party Transactions	Regulation 23(9) of the SEBI (Listing Obligations and Disclosure Requirements)	There was delay of Three(3) days in the submission of XBRL of Related Party Transactions as per Regulation	-	-	-	-	There was a delay of Three (3) days in filing of XBRL of Related Party Transactions for half yearly ended 31 st March 2023. The due date was 30 th	The Company has taken appropriate action in timely manner in the matter of violation of provision of	

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		Regulations, 2015	23(9) of the SEBI (LODR) Regulation, 2015 for the quarter ended March 2023.					May 2023 but the Company has submitted XBRL on 02 nd June 2023.	SEBI (LODR) Regulations, 2015.	
3.	Financial Results	Regulation 30 & 33 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in uploading financial results of the Company within the prescribed time limit for the quarter ended September 2023.	-	-	-	-	due to non-availability/want of Quorum, the meeting was adjourned to 17 th November 2023 in the next week at the same time and same venue, intimation of this adjournment was uploaded to BSE on the same day i.e. 10th November 2023	The Company has taken appropriate action in timely manner in the matter of violation of provision of SEBI (LODR) Regulations, 2015.	-
4.	Related Party Transactions	Regulation 23(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	There was delay of 2(Two) days in the submission of XBRL of Related Party Transactions as per Regulation 23(9) of the SEBI (LODR) Regulation, 2015	-	-	-	-	There was a delay of 2(Two) days in filing of XBRL of Related Party Transactions for half yearly ended 31 st September 2023. The due date was 18 th November 2023 but the Company has submitted XBRL on 20 th November 2023.	The Company has taken appropriate action in timely manner in the matter of violation of provision of SEBI (LODR) Regulations, 2015.	

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Vikas Verma & Associates, Company Secretaries



b) The 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 (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	-	-	-	-	-	-	-	-	-	-

Assumptions & 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 report 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

**For & on behalf of
Vikas Verma & Associates
Company secretaries
FRN: P2012DE081400**

**VIKAS
KUMAR
VERMA**
Vikas Kumar Verma
Managing Partner
M. No.: F9192
COP No.: 10786

Digitally signed by
VIKAS KUMAR VERMA
Date: 2024.05.29
15:41:32 +05'30'

**Date: 29th May 2024
Place: New Delhi
UDIN: F009192F000483886**

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