



Date: 15th June, 2021

To,
Asst. general Manager
Dept. of corporate services
BSE Limited,
P.J. Towers, Dalal Street,
Fort, Mumbai-400001
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To
The Secretary,
The Calcutta Stock Exchange Limited
7, Lyons Range, Kolkata 700001

Ref.: Scrip Code: 541741

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 read with clause 3(b) of SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report dated 14th June, 2021 issued by M/s Ajay Baroota & Associates, Practicing company Secretaries for the Financial year ended on 31st March, 2021.

We request you to take the above information on the record.

Thanking you

Yours faithfully,

For Tinna Trade Limited

Monika Gupta
(Company Secretary)
FCS-8015

TINNA TRADE LIMITED

CIN : L51100DL2009PLC186397

Regd. Office : No.-6, Sultanpur, (Mandi Road) Mehrauli, New Delhi-110030

Tel. No. : +91 11 4951 8530 (70 Lines) **Fax :** +91 11 2680 4883

E-mail : ttl.del@tinna.in **Website:** www.tinnatrade.in

Ajay Baroota & Associates
Company Secretaries
204, Nidhi Plaza, Plot No.8, LSC
Near Shakti Nagar Underbridge
Delhi-110052.
Email: baroota@rediffmail.com
baroota_csp@yahoo.co.in
Phone : 20838555, 9868450041

**Secretarial compliance report of Tinna Trade Limited
for the year ended 31st March, 2021**

I, Ajay Baroota proprietor of Ajay Baroota & Associates, Company Secretaries, having office at 204, Nidhi Plaza, Plot No. 8,LSC near Shakti Nagar Under bridge, Delhi-110052 have examined:

- (a) all the documents and records made available to us and explanation provided by *Tinna Trade 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, 2021 ("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; **(Not applicable as no reportable event during the period under review)**
- (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 as no reportable event during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable as no reportable event during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable as no reportable event during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable as no reportable event during the period under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable as no reportable event during the period under review)**

and circulars/ guidelines issued thereunder;

and based on the above examination, 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 there under, except in respect of matters specified below:-

<i>Sr.No</i>	<i>Compliance Requirement(Regulations/ circulars/ guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
	-	NIL	-

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.

(c) The following are the details of actions taken against the listed entity/ 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 action taken e.g. fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any
	-	NIL	-	-

(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 for the year ended 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	-	NOTAPPLICABLE AS NO SUCH OBSERVATION WAS MADE IN THE PREVIOUS REPORT	-	-

Place: Delhi
Date: 14.06.2021

For Ajay Baroota & Associates
Company Secretaries

AJAY
BAROOTA
Digitally signed
by AJAY
BAROOTA
Date: 2021.06.14
16:56:40 +05'30'

Prop Ajay Baroota
FCS No.: 3495
C P No.: 3945
UDIN : F003495C000459797

NOTE: Due to COVID-19 pandemic situation besides physical verification wherever possible, also relied on soft documents/records/scanned documents as provided during the course of audit.