



**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](mailto:orient.tradelink@gmail.com), Website: [www.orienttradelink.in](http://www.orienttradelink.in)

**Date:** 30.05.2022

To,  
The Manager,  
Listing Department,  
BSE Limited,  
Phiroze Jeejeebhoy Towers Dalal Street  
28<sup>th</sup> Floor, Dalal Street, Mumbai- 400001

**Company Symbol:** ORIENTTR  
**Script Code:** 531512

**Sub: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022**

Dear Sir/Madam,

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015; read along with SEBI Circular CIR/CFD/ CMD1 /27/2079 dated, February 08, 2019, we are submitting herewith Annual Secretarial Compliance Report dated 30<sup>th</sup> May, 2022 of the Company issued by Practicing Company Secretary for the Financial Year 2021-22.

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

Thanking you,

Yours faithfully,

**For and on behalf of  
For Orient Tradelink Limited**

**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

**SECRETARIAL COMPLIANCE REPORT OF  
ORIENT TRADELINK LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

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 31<sup>st</sup> March, 2022 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 for 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 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)**



- (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; **(Not applicable for the period under review)**
- (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, except in respect of matters specified below:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.	Delay in filing Reconciliation of Share Capital Audit Report for the quarter ended December, 2021	Submitted on 05 <sup>th</sup> April, 2022
2.	Regulation 30 & 33 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Current Statutory Auditor is non peer review.  Approval from shareholders is pending for appointment of Statutory Auditor.	<ul style="list-style-type: none"> <li>During the financial year 2021-2022 company has appointed the non-review statutory auditor by the audit committee and board of company due to casual vacancy arise.</li> <li>However due to unavoidable circumstance company was not</li> </ul>





			able to take the approval from shareholders within prescribed timelines for appointment of Auditor.
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(b) Except as mentioned above, the listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my/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	Actions Taken by	Details of violation	Details of action taken, if any	Observations/ Remarks of the Practicing Company Secretary, if any.
1.	BSE Limited	<b>Reg. 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015</b>  Non-compliance with requirement to appoint a qualified company secretary as the compliance officer for quarter ended 31 <sup>st</sup> December-2021	BSE imposed fine of Rs. 1,08,560	Company has filed clarification letter with the BSE in which clarify that, during the aforesaid period company secretary as compliance officer dated 20 <sup>th</sup> July, 2020. already appointed in the company As per Regulation 6(1) - of LODR 2015.  However in this regard company has not received any reply from BSE till date.
2.	BSE Limited	<b>Reg. 7(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for quarter ended</b>	BSE imposed fine of Rs. 1,08,560	Company has filed clarification letter with the BSE in which clarify that, during the aforesaid period, As per



		<p><b>31st December-2021</b></p> <p>Non-compliance with requirement to appoint share transfer agent</p>		<p>Regulation 7(1) – of LODR, company has appointed share transfer agent (RTA) namely Skyline Financial Services Pvt. Ltd.</p> <p>However in this regard company has not received any mail from BSE till date.</p>
3.	BSE Limited	<p><b>Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for quarter ended 31st December-2021</b></p> <p>Non-compliance of Composition of Board</p>	BSE imposed fine of Rs. 23,600	<p>During the quarter ended October to December 2021, women director is not appointed in the Company as applicable.</p> <p>Company has filed application for waiver off of fine with BSE for non-appointment of women director.</p>

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **(Not Applicable)**

Date: 30.05.2022  
Place: New Delhi  
UDIN: F009192D000427687



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

*Vikas Kumar Verma*  
Vikas Kumar Verma  
Managing Partner  
M. No. F9192  
C.O.P. No.: 10786