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NS-EN 9001 : 2000
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Oriental Trimex Limited

(An ISO 9001-2000 Certified Company)

Registered & Corporate Office : 26/25, Bazar Marg,
Old Rajender Nagar, New Delhi-110060
CIN : L74899DL1996PLC078339



May 28, 2022

To, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai, Maharashtra 400001	To, National Stock Exchange of India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai, Maharashtra 400051
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Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2022.

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Listing Regulations'), please find enclosed herewith Annual Secretarial Report for the financial year ended 31st March, 2022.

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

Thanking you

Yours truly,

For Oriental Trimex Limited

Rajesh Kumar Punia
Rajesh Kumar Punia
Managing Director
DIN: 00010289



POOJA MALHOTRA & CO.
COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058
Email: consult2ind@gmail.com
Tel: +91-9910374997

**Secretarial Compliance Report of Oriental Trimes Limited
for the year ended 31st March, 2022**

I, have examined:

- (a) all the documents and records made available to me and explanation provided by Oriental Trimes 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,

which has been relied upon to make this certification, for the year ended 31st March, 2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI")

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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; **Not applicable to the company during the year.**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not applicable to the company during the Review Period.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable to the company during the Review Period.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable to the company during the Review Period.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable to the company during the Review Period.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulation 2018 and circulars and guidelines issued thereunder;
- (j) The Securities and Exchange Board of India (Registrar to an Issue and Share transfer agents) Regulations, 1993;



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And based on the above examination, I 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 for the following:

S. No.	Compliance Requirement/Regulation (Circular/guidelines including specific clause)	Deviations	Observations/Remarks of Practicing Company Secretary
1.	As per regulation 6 (1) of SEBI (listing obligations and Disclosure Requirement) Regulations, 2015, a listed entity shall appoint a qualified Company Secretary as the compliance officer.	The Company had appointed a Company Secretary on 21.06.2021 after the resignation of previous company secretary i.e. on 26.10.2020. Accordingly, the Company was in default for non-appointment of a Company Secretary during the period commencing from 26.04.2021 to 20.06.2021.	The listed entity received notice for non-compliance with Regulation 6(1) of SEBI (listing obligations and Disclosure Requirement) Regulations, 2015 and imposed penalty for non-compliance from NSE. The company has written a letter to NSE requesting waiving off the penalty due to unavoidable covid curbs situations. Reply of Exchange is still not received.
2.	As per regulation 46 of Securities and exchange Board of India (listing obligations and Disclosure Requirement) Regulations, 2015, the listed entity shall maintain a functional website containing the basic information about the listed entity and shall disseminate the prescribed/specified information under a separate section on its website.	Website of listed entity has not been updated.	The listed entity is advised to update all the information or changes in content(s) at its website regularly.
3.	As per Regulation 33(3) (d) (listing obligations and Disclosure Requirement) Regulations, 2015. The listed entity shall submit Annual audited standalone financial results for the financial year, within sixty	The Company has submitted its Annual financial results beyond 30/06/2021(the extension was given by SEBI from 30.05.2021 to 30.06.2021).	I have been made to understand that the Company had on 30/06/2021 submitted a letter to BSE requesting extension of time for submission of results to stock exchange but did not



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	days from the end of the financial year along with the audit report and [Statement on Impact of Audit Qualifications (applicable only) for audit report with modified opinion)		received any reply on the same. The listed entity is advised to always submit Financials within the time prescribed in the Regulations.
4.	As per the provisions of Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018, Compliance Certificate needs to be filed for each quarter to stock exchange.	The company has not filed Compliance Certificate for the Quarter ended on September, 2021.	The listed entity is advised to always comply with the regulations on time.

- (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) No action 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 there under
- (d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

FOR POOJA MALHOTRA & CO.
Company Secretaries
Proprietor



Pooja Malhotra
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Date: 28.05.2022
Place: New Delhi

(POOJA MALHOTRA)
COMPANY SECRETARY
ACS 24033
CP No. 22704
UDIN: A024033D000415578