



MISHKA EXIM LIMITED

F14, First Floor, Cross River Mall, CBD Ground, Shahdara, Delhi-110032
CIN: L51909DL2014PLC270810 Email id:mishkaexim@gmail.com Contact No: 011-42111980

May 31, 2021

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001
Ref: BSE Script Code: 539220

SUB: Secretarial Compliance Report Year Ended 31st March 2021

Dear Sir/Ma'am

A copy of the Secretarial Compliance Report year ended 31st March 2021 as received from Parveen Rastogi & Co. Practicing Company Secretary is attached with this letter.

Please take this on Record.

For Mishka Exim Limited


Varun Gupta
CFO



Parveen Rastogi & Co.

Company Secretary

SECRETARIAL COMPLIANCE REPORT OF M/S MISHKA EXIM LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

I, Parveen Kumar Rastogi, Proprietor of M/s Parveen Rastogi & Co. have examined:

- a) All the documents and records made available to me and explanation provided by M/s Mishka Exim 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;



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- 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 to the Company during the Reporting Period}**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **{Not Applicable to the Company during the Reporting Period}**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **{Not Applicable to the Company during the Reporting Period}**.
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- i) SEBI (Delisting of Equity Shares) Regulations, 2009 **{Not Applicable to the Company during the Reporting Period}**
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.
- k) Other regulations as applicable and circulars/guidelines issued thereunder;

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 thereunder, except in respect of matter specified below:-



Sr. No	Compliance Requirement(Regulations/ circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 23 (9) of the Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements) Regulations, 2015, Where the listed entity shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis to the stock exchanges and publish the same on its website.	Non-compliance with disclosure of related party transactions on consolidated basis.	During the Audit, the Management informed us that the Company was unaware about the SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 regarding related party transactions disclosures on consolidated basis to the stock exchange.
2.	Regulation 17 (1) (c) of the Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements) Regulations, 2015, where board of directors of the top 2000 listed entities shall comprise of not less than six directors by April 1,2020.	The number of Directors on the Board was less than Six.	The Board of Directors of the Company comprised of Four Directors. During the Audit, the Management informed us that the Company doesn't have any knowledge regarding the fact that they are falling under the category of Top 2000 listed entities in order to appoint atleast six Directors on the Board.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my 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.
1	BSE Limited	Regulation 23 (9) of SEBI LODR Regulations, 2015- Non-compliance with disclosure of related party transactions on consolidated basis.	BSE vide its email dated January 18, 2021 has Imposed a Fine of Rs. 212400 (inclusive of GST @ 18 % i.e. Rs. 32400) levied for half year ended September 2020	The Company has complied with the requirement of Regulation 23 (9) of SEBI LODR Regulations, 2015. Further the Company has submitted a response vide email dated 05.02.2021 and has requested to waive off the fine on the grounds that the Company doesn't have any knowledge regarding the fact that they are required to submit the related party transactions disclosures on consolidated basis to the stock exchange.
2.	BSE Limited	Regulation 17(1)(c) of SEBI LODR	BSE vide its email dated November 17, 2020	The Company has appointed two more



		Regulations, 2015- Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	and May 17, 2021 has levied Fine of Rs.542800 (inclusive of GST @ 18 % i.e. 82800) for Quarter ended September 2020 And Rs. 472000 (inclusive of GST @ 18 % i.e. Rs. 32400) for Quarter ended March 2021 respectively.	Directors on the Board on 22/03/2021. in order to comply with the requirement of Regulation 17(1)(c) of SEBI LODR Regulations, 2015
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d) The listed entity has taken the following action 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 March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For Parveen Rastogi & Co.
Company Secretaries



Parveen Rastogi

M. No.: 4764

COP No.: 2883

Place: New Delhi

Date: 31.05.2021

UDIN: F004764C000401182