



MISHKA EXIM LIMITED

F-14, First Floor, Cross River Mall, CBD Ground, Shahdara, Delhi -110032
CIN: L51909DL2014PLC270810 Email id:mishkaexim@gmail.com Contact No: 011 42111981

May 20, 2022

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

SUB: Secretarial Compliance Report Year Ended 31st March 2022

Dear Sir/Ma'am

A copy of the Secretarial Compliance Report year ended 31st March 2022 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 Secretaries

SECRETARIAL COMPLIANCE REPORT OF MISHKA EXIM LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022

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

- All the documents and records made available to me and explanation provided by Mishka Exim Limited ("the listed entity"),
- The filings/ submissions made by the listed entity to the stock exchanges.
- website of the listed entity,
- any other document/ filing, as may be relevant, 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:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



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: Shop No. 5-6, Satyam Plaza, Plot No-4, Block-B & E, Dilshad Garden, North East Delhi-110093
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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 |
|--------|---|------------|---|
| - | - | - | - |

- 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. |
|---------|-----------------|----------------------|---|--|
| - | - | - | - | - |



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, 2021 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|--|--|
| 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. | 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. | The Company has complied with the requirement of Regulation 23 (9) of SEBI LODR Regulations, 2015 dated February 08, 2021. | The Company has complied with the requirement of Regulation 23 (9) of SEBI LODR Regulations, 2015 dated February 08, 2021. Consequentially, penalty so imposed by BSE vide its email dated 05 th February, 2021 to levy fine of Rs. 2,12,400 (inclusive of GST @ 18 % i.e. Rs. 32,400/- for the Quarter ended September 2020 has been waived off. |

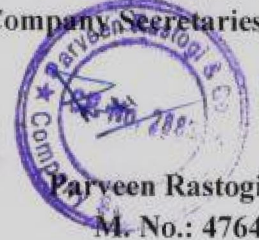


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|----|--|--|---|---|
| 2. | Regulation 17 (1) (c) of the Securities and Exchange Board of India(Listing Obligations and Disclosure Requirements) Regulations, 2015, where board of directors of the top 2000 listed entities shall comprise of not less than six directors by April 1, 2020. | The 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 at least six Directors on the Board. | The Company has complied with the requirement of Regulation 17(1) (c) of SEBI LODR Regulations, 2015 and has appointed the sixth director on its Board dated March 22, 2021 | It is complied with and the Company has appointed the directors on its Board on dated March 22, 2021. Consequentially, penalty so imposed by BSE vide its email dated 17 th November, 2020 to levy fine of Rs. 5,42,800 (inclusive of GST @ 18 % i.e. Rs. 82,800/- for the Quarter ended September 2020 has been waived off. However, fine imposed by BSE vide its email dated 05 th March, 2021 for Rs. 5,42,800/- (inclusive of GST @ 18 % i.e. Rs 32,400/-) for Quarter ended December 2020 and fine imposed by BSE vide its email dated 02 th June, 2021 for Rs. 4,72,000/- (inclusive of GST @ 18 % i.e. Rs 72,000/-) for |
|----|--|--|---|---|



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|--|--|--|--|---|
| | | | | Quarter ended March 2021 is still pending . |
|--|--|--|--|---|

For Parveen Rastogi & Co.
Company Secretaries



Parveen Rastogi
M. No.: 4764
COP No.: 2883

Place: New Delhi
Date: 20.May.2022
UDIN: F004764D000353035