



# 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 30, 2023

<b>To,</b> <b>BSE Limited,</b> Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai, Maharashtra 400001	<b>To,</b> <b>National Stock Exchange of India Limited</b> Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai, Maharashtra 400051
-------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------

**Sub: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2023.**

Dear Sir/ Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, please find enclosed herewith Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March, 2023.

Request you to kindly take this on record.

Thanking you.

Yours truly,

**For Oriental Trimex Limited**

Rajesh  
Kumar Punia

Digitally signed by  
Rajesh Kumar Punia  
Date: 2023.05.30  
18:18:10 +05'30'

**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: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

## Secretarial Compliance Report of Oriental Trimex Limited for the financial year ended 31<sup>st</sup> March, 2023

I/~~We~~ have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **Oriental Trimex Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at 26/25, BAZAR MARG, OLD RAJINDER NAGAR, NEW DELHI – 110 060. Secretarial Review was conducted in a manner that provided me/~~us~~ a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/~~our~~ observations thereon.

Based on my/~~our~~ verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I/~~we~~ hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I have examined:

- (a) all the documents and records made available to me and explanation provided by M/s **Oriental Trimex 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, 2023** ("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;
- (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 review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021: **Not Applicable for the review period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021: **Not Applicable for the review period;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) (other regulations as applicable)  
and circulars/ guidelines issued thereunder;

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

And, based on above examination, I/We hereby report that, during the Review Period:

1.(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)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
1	Disclosure of Related Party transactions on consolidated basis within 15 days of publication of Financial Results.	Regulation 23(9) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	Delay in submission of Report	BSE and NSE	Imposed Penalty for delay in filing.	There was delay in submission of Related Party Transactions as under: For the half yearly ended on 31 <sup>st</sup> March, 2022, it was due to be filed on 15.06.2022 but after delay of 2 days, it was filed on 17.06.2022. And for the half year ended on 30.09.2022, it was supposed to be filed by 05.11.2022, but it was filed on 07.11.2022	Rs. 16,200/- by NSE and Rs. 16,200/- by BSE.	There was a delay in filing disclosure under Regulation 23 (9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.  In respect thereto, penalty for non-compliance has been imposed by the stock exchange was paid by	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the Company will take	Acknowledged

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

						after delay of 2 days.		the Company.	extra precaution.	
2.	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.	Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018	Delay in submission of Certificate with Stock Exchange	-	-	The Company has submitted Certificate under Regulation 74(5) of SEBI (Depositories and Participants) Regulations, 2018 with stock exchange on 29 <sup>th</sup> April, 2022 to BSE and on 01 <sup>st</sup> May to NSE for the Quarter ended on 31.03.2022 which was due to be filed on 15.04.2022.  For the Quarter ended on 30.06.2022, it was filed on 18.07.2022 for which due date was 15.07.2022 and for the quarter ended 31.12.2022, it was filed on 17.01.2023 for which due date was	-	There was delay in filing disclosure under Regulation 74 (5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the Company will take extra precaution.	Acknowledged

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

						15.01.2023.				
3.	Intimation of closure of trading window in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Intimation of closure of trading window in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Delay in filing of Notice of Closure of Trading window.	-	-	The listed entity was in compliance with Regulation SEBI (Prohibition of Insider Trading) Regulations, 2015 except for the Quarter ended on 30th September, 2022. As Company published notice of closure of trading window on Stock Exchange on 1st October, 2022 which was to be filed on 30th September, 2022. There was one day delay.  Further published notice of closure of trading window to NSE for the	-	The Company has published notice of closure of trading window on Stock Exchange on 1st October, 2022 which was to be filed on 30th September, 2022. There was one day delay.  Further published notice of closure of trading window to NSE for the Quarter ended on 31 <sup>st</sup> March, 2023 on 01 <sup>st</sup> April 2023 which was due on 31 <sup>st</sup> March, 2023	The delay was unintentional. We will be more cautious in future Compliances.	Acknowledged.

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

						Quarter ended on 31 <sup>st</sup> March, 2023 on 01 <sup>st</sup> April 2023 which was due on 31 <sup>st</sup> March, 2023				
--	--	--	--	--	--	----------------------------------------------------------------------------------------------------------------------------	--	--	--	--

(a) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
1.	Appointment of Qualified Company Secretary as Compliance officer of Listed Company	Regulation 6(1) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	Non-appointment of Company Secretary for 56 days	NSE	Imposed penalty	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	Rs. 56000	That the non-compliance was due to covid curbs and the penalty thereto has been paid. Will be cautious in future Compliance.	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was	Acknowledged

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

						during the period commencing from 26.04.2021 to 20.06.2021 .			circumstantial. In future the Company will take extra precaution.	
2.	Submission of Shareholding Pattern with Stock Exchanges	Regulation 31 of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	Late submission of shareholding pattern.	NSE	Imposed Penalty	Delay in submission of shareholding pattern by 1 day for the Quarter ended on Dec, 2020	Rs. 2300	That the non-compliance was due to covid curbs and the penalty thereto has been paid. Will be cautious in future Compliance .	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the Company will take extra precaution.	Acknowledged
3	Submission of Financial Results with Stock Exchange	Regulation 33 of Securities and Exchange Board of India (Listing Obligations and	Late submission of Financials Results	BSE	Imposed Penalty	Delay in publishing March, 2021 yearly Result for 10 days	Rs. 50,000	That the non-compliance was due to covid curbs and the penalty thereto has been paid. Will be	Board discussed the matter in the Board Meeting and considered the same and	Acknowledged

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

		Disclosures Requirements) Regulations, 2015						cautious in future Compliance	affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the Company will take extra precaution.	
4	As per the provisions of, Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018, Compliance Certificate needs to be filed for each quarter to stock exchange.	Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018	The company has not filed Compliance certificate for the Quarter ended on September, 2021.	-	-	The company has not filed Compliance certificate under Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018 for the Quarter ended on September, 2021.	-	That the non-compliance was due to covid curbs. Will be cautious in future Compliance	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the	Acknowledged



# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

									Company will take extra precaution.	
5.	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.	Regulation 46 of Securities and exchange Board of India (listing obligations and Disclosure Requirement) Regulations, 2015	Website of listed entity has not been updated.	-	-	Website of listed entity has not been updated.	-	The Company has been advised to comply with the Regulation 46 of Securities and exchange Board of India (listing obligations and Disclosure Requirement) Regulations, 2015 to avoid future penalties.	Board discussed the matter in the Board Meeting and considered the same and affirms that non compliance of the provision is not mens rea on the part of the Company and it were non intentional rather it was circumstantial. In future the Company will take extra precaution.	Acknowledged.

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
<b>1.</b>	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	<p><b>i.</b> If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p><b>ii.</b> If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p><b>iii.</b> If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA	No statutory Auditor has resigned from the Company in the review period.
<b>2.</b>	<b>Other conditions relating to resignation of statutory auditor</b>		
	<p><b>i.</b> Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p style="padding-left: 20px;"><b>a.</b> In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p>	NA	No statutory Auditor has resigned from the Company in the review period.

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
	<p><b>b.</b> In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p><b>c.</b> The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p><b>ii. Disclaimer in case of non-receipt of information:</b></p> <p>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	NA	No statutory Auditor has resigned from the Company in the review period.

III. I hereby report, during the review period, the Compliance status of Listed Entity is appended as below:

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p><b>Secretarial Standards:</b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	NIL
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>● All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	NIL
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>● The Listed entity is maintaining a functional website</li> <li>● Timely dissemination of the documents/ information under a separate section on the website</li> <li>● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website</li> </ul>	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.
4.	<p><b>Disqualification of Director:</b></p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	NIL

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b>  (a) Identification of material subsidiary companies  (b) Disclosure requirement of material as well as other subsidiaries	NA	NA
----	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----	----

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
6.	<b>Preservation of Documents:</b>  The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	NIL
7.	<b>Performance Evaluation:</b>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	NIL
8.	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	NIL
9.	<b>Disclosure of events or information:</b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NIL

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

10.	<p><b>Prohibition of Insider Trading:</b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	<p>The listed entity was in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 except following observations:</p> <p>For the Quarter ended 30<sup>th</sup> September, 2022, Listed Entity has submitted required Compliance certificate of SDD with Bombay Stock Exchange on 27<sup>th</sup> January, 2023 for which due date was 18<sup>th</sup> November, 2022.</p> <p>Further Listed Entity has submission on email that the Listed Entity has submitted SDD Certificate to National Stock exchange through email for the Quarter ended on 30<sup>th</sup> September, 2022 and For Quarter ended on 31<sup>st</sup> December, 2022 but due to technical error in email from which certificate was sent, management is unable to trace the proof of submission.</p>
11.	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).</p>	Already covered above	<p>Action taken is mentioned above adjacent to the Specific regulations.</p>

# POOJA MALHOTRA & CO. COMPANY SECRETARIES

Reg Off: Plot No. 160, Block A-4C, Janak Puri, New Delhi-110058

Email: [consult2tnd@gmail.com](mailto:consult2tnd@gmail.com)

Tel: +91-9910374997

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
12.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	No specific remarks

### Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

FOR POOJA MALHOTRA & CO.  
Company Secretaries

POOJA  
MALHOTRA

Digitally signed by  
POOJA MALHOTRA  
Date: 2023.05.29  
22:21:34 +05'30'

(POOJA MALHOTRA)  
COMPANY SECRETARY  
ACS 24033  
CP No. 22704  
UDIN: A024033E000411068

Date: 29.05.2023  
Place: New Delhi