

MTL/SEC/2021-22/12

Dated : 30.06.2021

To,
The Secretary,
Bombay Stock Exchange Limited,
Floor 25, P. J. Towers
Dalal Street,
Mumbai- 400001 (MH)

SCRIP Code: 511758

SUB : SUBMISSION OF ANNUAL SECRETARIAL COMPLIANCE REPORT UNDER REGULATION 24A OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) (AMENDMENT) REGULATIONS, 2018

Dear Sir / Madam,

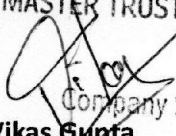
Pursuant to Regulation 24A of SEBI (Listing Obligations And Disclosure Requirements) (Amendment) Regulations, 2018, we herewith enclose the Annual Secretarial Compliance Report in respect of the Company under the said regulation for the year ended March 31st, 2021.

Kindly take the above information on records please.

Thanking You.

Yours Faithfully

For Master Trust Limited
For MASTER TRUST LIMITED


Company Secretary

Vikas Gupta

Company Secretary & Compliance Officer

Encl: Annual Secretarial Compliance Report issued by Practicing Company Secretary

**Annual Secretarial Compliance Report of
Master Trust Limited for the year ended 31st March, 2021**

(Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

MASTER TRUST LIMITED,
SCO 19, Master Chambers,
Feroze Gandhi Market,
Ludhiana - 141001.
(CIN: L65991PB1985PLC006414)

We, Rajeev Bhambri & Associates - Company Secretaries, have examined:

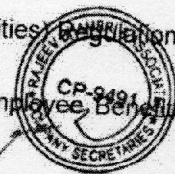
- (a) all the documents and records made available to us and explanation provided by **Master Trust Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) Minutes of Board and Committees of Board of Company, and
- (d) other Secretarial Records,

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, as applicable, 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



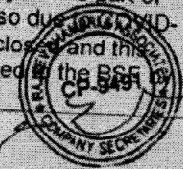
SCO 9, 2nd Floor, Jandu Tower, Miller Ganj, Ludhiana-141 003.
Cell : 99157-10010, 89688-00333 (O) : 0161-4626033
E-mail : rajeev.bhambri@gmail.com

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued thereunder;

and based on the above examination, I/We 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 matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1	Intimation of appointment of Independent Director	Intimations, in general, are to be provided within 24 hours	The intimation of the appointment of Sh. Rajiv Kalra was not provided within 24 hours. The Company informed that they had already disclosed the fact in the outcome of Board Meeting.
2	74(5) of SEBI (Depositories and Participants) Regulations, 2018	Not filed by the company for the quarter ended 30.06.2020	Not filed by the company for the quarter ended 30.06.2020. The Company has informed that the RTA (Skyline) failed to provide the requisite Report, so the company was not able to submit the report.
3	74(5) of SEBI (Depositories and Participants) Regulations, 2018	Not filed by the company for the quarter ended 30.09.2020	Not filed by the company for the quarter ended 30.09.2020. The Company has informed that the RTA (Skyline) failed to provide the requisite Report, so the company was not able to submit the report.
4	Listing Fee	The listing fee was not paid by the company by due date i.e. 30.04.2021	The Listing Fee was not paid by the company in due time and was paid by the company on 03.05.2021. The Company has informed that the invoice was received on 22.04.2021 which led to the delay on the part of the company and also due to COVID-19 the offices were closed and this fact was duly intimated to the Company.



(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/our examination of those records.

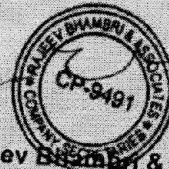
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	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.
NIL				

(d) The listed entity has taken the following actions 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Rajeev Bhatnagar



Rajeev Bhatnagar & Associates
 Company Secretary in whole time practice
 C.P. No. 9491

Place: Ludhiana
 Dated: 11.06.2021
 UDIN: F004327C000447165

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