



Oriental Trimex Limited

(An ISO 9001-2000 Certified Company)

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



June 29, 2021

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, 2021.

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 31st March, 2021.

Request you to kindly take this on 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: consult2tnd@gmail.com

Tel: +91-9910374997

Secretarial Compliance Report of Oriental Trimex Limited for the year ended 31st March, 2021 (Pursuant to SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8th February 2019 read with Regulation 24 A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

I, Pooja Malhotra & Co. have examined:

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

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 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:

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- (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;
- (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;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

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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 appointment of Company Secretary as under:

“the company had appointed a Company Secretary on 14.08.2020 after the resignation of previous company secretary i.e. on 14.11.2019. Accordingly, the Company was in default for non-appointment of a Company Secretary during the period commencing from 14.05.2020 to 13.08.2020.

- (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 **except** Penalty levied for non compliance of Regulation 6(1) of SEBI ((Listing Obligations and Disclosure Requirements) Regulations, 2015 by Bombay Stock Exchange and National Stock Exchange for non- appointment of Company Secretary.

FOR POOJA MALHOTRA & CO.
Company Secretaries
Proprietor




CS Pooja Malhotra

Date: 28.06.2021

Place: New Delhi
ACS 24033
CP No. 22704
UDIN: **A024033C000525853**