



# ASIAN TEA & EXPORTS LTD.

CIN No. L24219WB1987PLC041876  
Sikkim Commerce House, 4/1, Middleton Street,  
Kolkata - 700 071 Tel: +91 33 2287 9732 / 7334, 4006 36D1 / 3602  
Email: info@asianteaexports.com, Website:www.asianteaexports.com

To,

30<sup>th</sup> July, 2020

<b>Bombay Stock Exchange Limited</b> <b>Phiroze Jeejebhoy Towers</b> <b>Dalal Street, 25<sup>th</sup> Floor</b> <b>Mumbai- 400001</b> <b>Script Code: 519532</b>	<b>Calcutta Stock Exchange Association Limited</b> <b>7, Lyons Range</b> <b>Kolkata – 700001</b>
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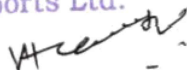
Dear Sir,

**Re: Submission of Secretarial Compliance Report for the year ended 31st March, 2020**

Pursuant to the circular CIR/CFD/CMD 1/27/2019 of SEBI dated 8<sup>th</sup> February, 2019 and Regulation 24A of SEBI (LODR) Regulations 2015, we submit herewith Secretarial Compliance Report of the Company issued by CS Tanmay Saha Company Secretary for the year ended 31<sup>st</sup> March, 2020.

Kindly acknowledge the same.  
Thanking you,

Yours faithfully,  
**For Asian Tea & Exports Ltd**  
Asian Tea & Exports Ltd.

  
Director

**Hariram Garg**  
**(Director)**

# SAHA TANMAY AND CO.

Company Secretaries

1, Sardar Para, Ground Floor, Badamtala, P.O. : Brahmapur, Kolkata – 700 096

Tel : 98318 86005 / 87777 16817 | E-mail : fcstanmay@gmail.com

To,  
The Board of Directors,  
**M/s. Asian Tea & Exports Limited**  
**CIN : L24219WB1987PLC041876**  
Sikkim Commerce House,  
4/1, Middleton Street, 5<sup>th</sup> Floor  
Kolkata – 700 071

We have been engaged by ASIAN TEA & EXPORTS LIMITED (**hereinafter referred to as ‘the Company’**) bearing CIN: L24219WB1987PLC041876 whose equity shares are listed on BSE Limited and CSE Limited to conduct an verification in terms of SEBI’s Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

We conducted the audit by examining the secretarial records including minutes, documents, registers, intimations sent to the stock exchanges other records and returns related to the applicable laws on the Company etc. However, due to nationwide lockdown to fight COVID-19, some of the documents and records mentioned above have been received via electronic means and as such, could not be verified from the original’s thereof. The management has confirmed that the records submitted to us are the true and correct. We have also relied upon representation given by the management of the company for certain areas which otherwise requires physical verification.

Annual Secretarial Compliance Report is enclosed.



**For SAHA TANMAY AND CO.**

Company Secretaries

A handwritten signature in black ink that reads "Tanmay Kumar Saha".

**Tanmay Kumar Saha**

**Proprietor**

**Membership No. F8847**

**C. P. No. 11918**

Place : Kolkata  
Date : 29.07.2020

# SAHA TANMAY AND CO.

Company Secretaries

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## SECRETARIAL COMPLIANCE REPORT OF M/S. ASIAN TEA & EXPORTS LIMITED FOR THE YEAR FINANCIAL YEAR ENDED 31.03.2020

We Saha Tanmay and Co., Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. Asian Tea & Exports 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, 2020 (“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; (Not Applicable to the Company during the Audit Period)
- 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 Audit Period)
- 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; (Not Applicable to the Company during the Audit Period)



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- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the Company during the Audit Period)
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client.

Circulars/ guidelines issued thereunder and based on the above examination, 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.
- (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) There are no 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.



**For SAHA TANMAY AND CO.**  
Company Secretaries

*Tanmay Kumar Saha*

**Tanmay Kumar Saha**  
Proprietor

**Membership No. F8847**

**C. P. No. 11918**

**UDIN : F008847B000525264**

Place : Kolkata  
Date : 29.07.2020