



Ekata Agrawal & Associates

Company Secretaries

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ANNUAL SECRETARIAL COMPLIANCE REPORTS OF
M/S. SHREE GLOBAL TRADEFIN LIMITED
FOR THE YEAR ENDED 31st MARCH, 2022

To,
The Board of Directors,
Shree Global Tradefin Limited
CIN: L27100MH1986PLC041252

I, Ekata Agrawal, Company Secretary in Practice working in the name and style of Ekata Agrawal & Associates Firm of Company Secretaries have examined;

- all the documents and records made available to us and explanation provided by Shree Global Tradefin 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;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not Applicable during the Review Period.**
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:- **Not Applicable during the Review Period.**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:- **Not Applicable during the Review Period.**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013:- **Not Applicable during the Review Period.**
- and such other circulars/guidelines issued and applicable to the Company thereunder.

And based on the above examination, I hereby report that, during the Review Period;

- The listed entity has complied with the applicable 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
Nil			

- The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- 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.
01	BSE Ltd. vide its emails received on 22.11.2021, 08.12.2021 & 04.04.2022	Regulation 6(1) Non-compliance with requirement to appoint a qualified Company Secretary as the compliance officer.	Fine of Rs.50740/- was imposed for the quarter ended September, 2021 by the BSE Ltd.	The Company has submitted all the documents related to the same and requested to the BSE Ltd. for waiver of fine vide letters dated 23.11.2021, 09.12.2021 & 28.02.2022, and email dated 17.02.2022 & 04.04.2022 is pending with the BSE Ltd.

(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 31 st March, 2020 (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
N.A.				

For Ekata Agrawal & Associates
Practicing Company Secretaries



Ekata Agrawal

Company Secretary
M.No.: 65640 & COP: 25098
UDIN: A865640D000274301
Place: Sambalpur & Date: 05/05/2022