



Date: 30<sup>th</sup> June, 2020

To,  
Asst. general Manager  
Dept. of corporate services  
BSE Limited,  
P.J. Towers, Dalal Street,  
Fort, Mumbai-400001

To  
The Secretary,  
The Calcutta Stock Exchange Limited  
7, Lyons Range, Kolkata 700001

Ref.: Scrip Code: 541741

**Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.**

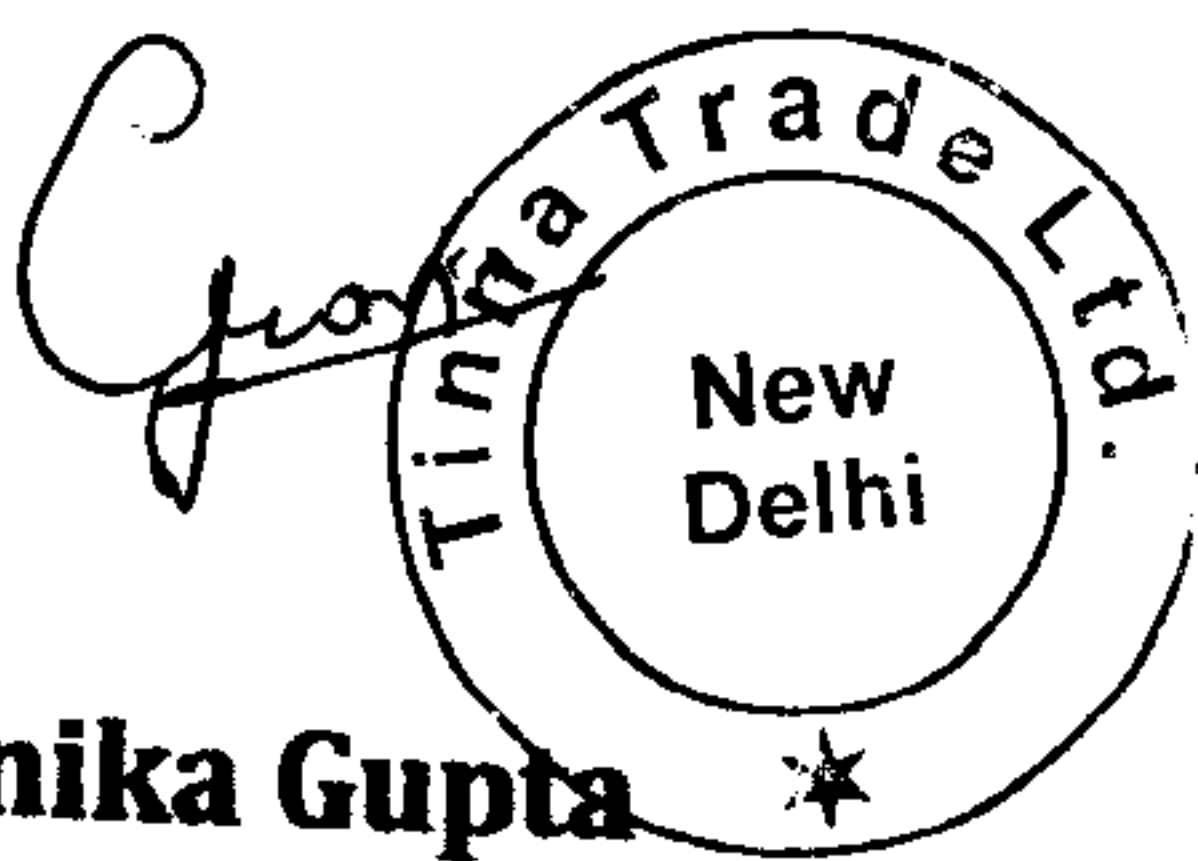
Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 read with clause 3(b) of SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith Annual Secretarial Compliance Report dated 29<sup>th</sup> June, 2020 issued by M/s Ajay Baroota & Associates, Practicing company Secretaries for the Financial year ended on 31<sup>st</sup> March, 2020.

We request you to take the above information on the record.

Thanking you

Yours faithfully,  
For Tinna Trade Limited



**Monika Gupta**  
**(Company Secretary)**  
**FCS-8015**

**TINNA TRADE LIMITED**

CIN : L51100DL2009PLC186397

Regd. Office : No.-6, Sultanpur, (Mandi Road) Mehrauli, New Delhi-110030

Tel. No. : +91 11 4951 8530 (70 Lines) Fax : +91 11 2680 4883

E-mail : ttl.del@tinna.in Website: www.tinnatrade.in



# AJAY BAROOTA & ASSOCIATES

COMPANY SECRETARIES

204, NIDHI PLAZA, PLOT NO. 8, L.S.C., NEAR SHAKTI NAGAR UNDER BRIDGE, DELHI-110052  
PHONE : 011-23653555 MOBILE : 9868450041, 9810355223 E-MAIL : baroota@rediffmail.com, baroota\_csp@yahoo.co.in

*Ajay Baroota*

M.Com., LL.B., FCS

## Secretarial compliance report of Tinna Trade Limited for the year ended 31<sup>st</sup> March, 2020

I, Ajay Baroota proprietor of Ajay Baroota & Associates, Company Secretaries, having office at 204, Nidhi Plaza, Plot No. 8, LSC near Shakti Nagar Under bridge, Delhi-110052 have examined:

- (a) all the documents and records made available to us and explanation provided by *Tinna Trade 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 as no reportable event during the period under review)
- (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 as no reportable event during the period under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable as no reportable event during the period under review)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable as no reportable event during the period under review)





- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable as no reportable event during the period under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not applicable as no reportable event during the period under review)

and 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 there under, 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	-

- (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) 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	-	-





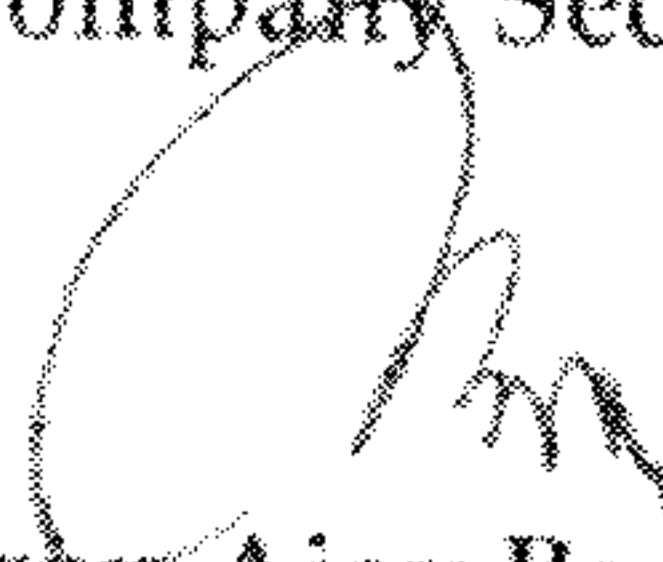
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	NOT APPLICABLE AS NO SUCH OBSERVATION WAS MADE IN THE PREVIOUS REPORT	-	-

Place: Delhi  
Date: 29/06/2020

For Ajay Baroota & Associates  
Company Secretaries



  
Prop Ajay Baroota  
FCS No.: 3495  
C P No.: 3945  
UDIN: F003495B000395513

NOTE: Due to COVID-19 pandemic situation besides physical verification wherever possible, also relied on soft documents/records/scanned documents as provided during the course of audit.