

**Ajay Baroota & Associates**  
**Company Secretaries**  
**204, Nidhi Plaza, Plot No.8, LSC**  
**Near Shakti Nagar Underbridge**  
**Delhi-110052.**

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## **Secretarial compliance report of Tinna Trade Limited for the year ended 31<sup>st</sup> March, 2022**

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, 2022 ("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 and Sweat Equity Regulations, 2021;**(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 Securities) Regulations, 2021**(Not applicable as no reportable event during the period under review)**
- (h) 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)**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) The provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(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 thereunder, except in respect of matters specified below:-

<i>Sr. No</i>	<i>Compliance Requirement(Regulations/ circulars / guidelines including specific clause)</i>	<i>Deviations</i>	<i>Observations/ Remarks of the Practicing Company Secretary</i>
	-	NIL	-

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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:

<i>Sr. No.</i>	<i>Action Taken by</i>	<i>Details of Violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment, etc.</i>	<i>Observations/ Remarks of the Practicing Company Secretary, if any</i>
	-	NIL	-	-

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

<i>Sr. No</i>	<i>Observations of the Practicing Company Secretary in the previous reports</i>	<i>Observations made in the secretarial compliance report for the year ended 31<sup>st</sup> March, 2021</i>	<i>Actions taken by the listed entity, if any</i>	<i>Comments of the Practicing Company Secretary on the actions taken by the listed entity</i>
	-	NOTAPPLICABLE AS NO SUCH OBSERVATION WAS MADE IN THE PREVIOUS REPORT	-	-

Place: Delhi

Date: 20<sup>th</sup> May, 2022

For Ajay Baroota & Associates  
Company Secretaries

Prop Ajay Baroota  
FCS No.: 3495  
C P No.: 3945  
UDIN : F003495D000348906  
PR Cert No. 2071

**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.**