

Prachi Todi

Company Secretaries
33C, Satish Mukherjee Road,
Near Gouriya Math,
Kolkata-700026

Mobile No: 9830072442

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SECRETARIAL COMPLIANCE REPORT

OF

ASIAN TEA AND EXPORTS LTD

FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2022

[Pursuant to Circular No. CIR/CFD/CMDI/27/2019 dated 08/02/2019 issued by
Securities and Exchange Board of India]

To
The Members,
Asian Tea and Exports Ltd
Sikkim Commerce House
4/1 Middleton Street
Kolkata - 700071,

I, Prachi Todi, Company Secretary in Practice have examined:

- (a) all the documents and records made available to me and explanation provided by **M/S ASIAN TEA AND EXPORTS LTD** ("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 on 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:
 - (i) the Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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. As per the information available at the website of the CSE as on 13th August 2018, the status of the Company was suspended. However, as informed to me by the management of the Company, the Board had applied for revocation of its suspension from CSE website.



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application dated 20th January 2021. The final order of revocation was passed by the Exchange on 09th April, 2021 which was effective from 16th April 2021. Furthermore, as informed to me by the management of the Company, certain compliances that were required to be intimated to the Calcutta Stock Exchange during the year under review, could not be done due to some technical issues;

- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- (e) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;
- (f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
- (h) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **-Not Applicable for the review period**
- (i) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **-Not Applicable for the review period**
- (j) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **-Not Applicable for the review period**
- (k) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **-Not Applicable for the review period**

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 thereunder, except in respect of matters specified below: -

Sl. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD-	The Company had conducted its Board Meeting for Approval of Quarterly Financial Results for the quarter ended 30 th June, 2021 on 27 th August, 2021, and for the quarter and half year ended 30 th September	Adequate disclosures had been given specifying the reasons for delay in submission of financial results to the concerned stock exchanges pursuant to SEBI Circular



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1/142/2018 dated 19 th November, 2018.	2021 on 14 th February, 2022, i.e., beyond the stipulated time period	CIR/CFD/CMD-1/142/2018 dated 19 th November, 2018. Due to delay in filing the Quarterly Financial Results for 30 th June, 2021 the Company has paid a penalty of Rs. 64,900. It was also observed that the Company has requested the concerned Stock Exchanges to inform them the amount of penalty imposed on the Company due to late filing of Quarterly Financial Results for the quarter and half year ended 30 th September, 2021. The Company is waiting for the revert from the concerned Stock Exchanges.
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(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 my 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:

Sl. 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.
Not Applicable				

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



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Sl. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company had filed its Annual Report with the concerned Stock Exchanges for the Financial Year ending on 31 st March 2020, on 02 nd December 2020 i.e., beyond the stipulated time period.	-	The Company has paid a penalty of Rs. 9440/- for delay in filing its Annual Report for the Financial Year ending on 31 st March 2020.	The Company has timely filed the Annual Report for the financial year ending 31 st March 2021, to the concerned Stock Exchanges.
2.	The Company had delayed its payment of Listing Fees to the Calcutta Stock Exchange.	-	During the year under review, the Company has timely paid its Listing Fees to the Calcutta Stock Exchange.	-
3.	The Company had not filed its Certificate under Regulation 74(5) for the quarter ended 30 th June, 2020, within the stipulated time period.	-	-	-
4.	The Company had conducted its Board Meeting for Approval of Quarterly Financial Results for the quarter ended 30 th June, 2020 on 07 th January 2021, for the quarter and half year ended 30 th September, 2020 on 13 th January, 2021, for the quarter ended 31 st December, 2020 on 19 th February, 2021 i.e., beyond the stipulated time period.	The Company had conducted its Board Meeting for Approval of Quarterly Financial Results for the quarter ended 30 th June, 2021 on 27 th August, 2021, and for the quarter and half year ended 30 th September 2021 on 14 th February, 2022, i.e., beyond the	Due to delay in filing of Quarterly Financial Results , the Company has paid the below-mentioned amounts as penalty: 1) For the quarter ended 30th June, 2020-Rs. 5,84,100/- 2) For the quarter and half year ended 30th September, 2020-Rs. 3,42,200/- 3) For the quarter ended 31st	Adequate disclosures had been given specifying the reasons for delay in submission of financial results to the concerned stock exchanges pursuant to SEBI Circular No. CIR/CFD/CMD-1/142/2018 dated 19 th November, 2018.



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	stipulated time period.	December 2020- Rs. 29,500/- 4) For the quarter ended 31 st March 2021- Rs. 1,71,100/-	
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Prachi Todi

Practicing Company Secretary

M. No.: 53022

C.P. No.: 22964

Peer Review Certificate No.: 1445/2021

UDIN: A053022D000418079

Date: 28/05/2022

Place: Kolkata