

GRANDMA TRADING & AGENCIES LIMITED

Regd. Office: Flat No. 202, 12-2-417, Sharadanagar, Mehdiapatnam,
Hyderabad, Telangana 500067, India;
CIN: L99999TG1981PLC100740; Website: www.grandmatrading.com

GTAL/BSE/2020-21

Date: 06/08/2022

The Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

Scrip ID: GRANDMA

Scrip Code: 504369

Sub.: Secretarial Compliance Report for the financial year ended 31st March, 2020

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015

With reference to the captioned subject, please find enclosed the Secretarial Compliance Report of the Company under Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the financial year ended 31st March, 2020 issued by Jain Rahul & Associates, Company Secretaries.

This is for your information and records.

Thanking you,

Yours faithfully,
For Grandma Trading and Agencies Limited



Sonal Nakum
Company Secretary & Compliance Officer





C.S. Rahul Jain
B.Com., A.C.S.

Jain Rahul & Associates

Company Secretaries

Ref

Date.....

SECRETARIAL COMPLIANCE REPORT of Grandma Trading and Agencies Limited for the year ended 31st March 2020

We Jain Rahul & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by Grandma Trading and Agencies Limited ("the listed entity");
- (b) the filings and submissions made by the listed entity to the BSE Limited, ("the stock exchange");
- (c) website of the listed entity;
- (d) any other document and filing, as may be relevant, which has been relied upon to make this certification;

for the year ended 31st 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 during the Review 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 during the Review Period].
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [Not applicable during the Review Period].

Rahul Jain



Jain Rahul & Associates

Company Secretaries

C.S. Rahul Jain
B.Com., A.C.S.

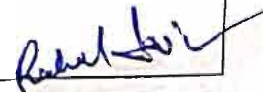
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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not applicable during the Review Period].
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [Not applicable during the Review Period].
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; 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: -

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
01.	<i>In terms of the provisions of Regulation 6 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 a listed entity shall appoint a qualified company secretary as the compliance officer</i>	<i>Company has not appointed a qualified Company Secretary as Compliance Officer.</i>	<i>Company yet to appoint Company Secretary</i>
02.	<i>In terms of regulation 14 Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall pay fees for the year 2018-19 and 2019-20 to the Stock Exchange on or before 30th April.</i>	<i>Company has failed to pay the same.</i>	<i>Company is yet to pay the Annual Listing Fees and Interest thereon.</i>
03.	<i>In terms of regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall have functional website containing the basic information about the Company.</i>	<i>The Companies' website is not functional.</i>	<i>The Company is trying to comply with this regulation</i> 



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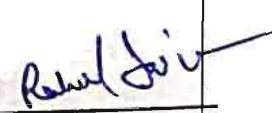
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04.	<i>In terms of regulation 31(1)(b) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange a statement showing holding of securities and shareholding pattern separately for each class of securities on a quarterly basis, within twenty-one days from the end of each quarter.</i>	<i>The Company is failed to file Shareholding pattern within 21 days for the quarter period of June 2019, September, 2019 December, 2019 and March, 2020.</i>	<i>The Company is yet to filed the Shareholding Pattern of June 2019, September, 2019, December, 2019 and March 2020.</i>
05.	<i>In terms of regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 Every issuer shall submit Share Capital Audit Report to the Stock Exchange a quarterly basis, within thirty days from the end of each quarter.</i>	<i>The Company is failed to file Share Capital Audit Report within 30 days for the quarter period of June, 2019, September, 2019, December, 2019 and March 2020.</i>	<i>The Company has yet to filed the Share Capital Audit Report of June, September, December, 2019 and March 2020.</i>
06.	<i>In terms of Regulation 27(2) of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange Corporate Governance Report on a quarterly basis, within 15 days from the end of each quarter.</i>	<i>The Company is failed to file Corporate Governance Report for the quarter ended June, September, December 2019 and March, 2020.</i>	<i>The Company yet to file the Corporate Governance Report for all 4 quarters of 2019-20.</i>
07.	<i>In terms of Regulation 13(3) of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange a Statement of Investor Complaints on a quarterly basis, within 21 days from the end of each quarter.</i>	<i>The Company is failed to filed Statement of Investor Complaints within 21 days for the quarter period of June, September, December 2019 and March, 2020.</i>	<i>The Company yet to file the Statement of Investor Complaints for all four quarters of 2019-20.</i>
08.	<i>In terms of Regulation 33 of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange within 45 days and within 60 days in case of Annual Audited Financial Results.</i>	<i>The Company is failed to filed Financial Results within 45 / 60 days for the quarter period of June, September, December 2019 and March, 2020.</i>	<i>The Company yet to file the Financial Results for all 4 quarters of 2019-20.</i>

Rahul Jain



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Ref			Date.....
09.	<i>In terms of Regulation 7(3) of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange a Compliance Certificate Certifying maintaining physical & electronic transfer facility within 1 month of each half of financial year</i>	<i>The Company is failed to filed Compliance Certificate within 1 month for the half year September, 2019 and March, 2020.</i>	<i>The Company yet to file the Compliance Certificate for September, 2019 and March, 2020.</i>
10.	<i>In terms of Regulation 40(9) of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange a Certificate from Practicing Company Secretary within 1 month of the end of each financial year.</i>	<i>The Company is failed to file Certificate from PCS for the half year September, 2019 and March, 2020.</i>	<i>The Company yet to file the Certificate for September, 2019 and March, 2020.</i>
11.	<i>In terms of Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosures and Requirements) Regulations, 2015 the listed entity shall submit to the Stock Exchange Disclosures of Events or information specified in Schedule III</i>	<i>1). The Company is failed to filed event-based disclosures as required to filed under Regulation 30. 2), Outcome of Board Meeting to be filed within 30 minutes of Conclusion of Board Meetings. Company failed to submit the same with the Stock exchange</i>	<i>1). The Company yet to file the Event based disclosures occurred during the year 2019-20. 2). The Company yet to file the Outcome of Board Meeting in case of Financial Results for all the quarters held during the financial year 2019-20.</i>
12.	<i>In terms of Regulation 74(5) of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 the listed entity shall submit to the Stock Exchange a Certificate within 15 days of receipt of the Certificate from RTA.</i>	<i>The Company is failed to file a Certificate received from Registrar and Share Transfer Agent (RTA) within fifteen days of receipt of the same</i>	<i>The Company yet to file the same.</i>
13.	<i>In terms of Regulation 34 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 the listed entity shall submit to the Stock Exchange Annual Report.</i>	<i>The Company is failed to Submit the Annual Report to the Stock Exchange.</i>	<i>The Company has not Complied the same.</i> 



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Ref		Date.....
14.	<p><i>In terms of regulation 47 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the Listed entity shall publish the following information in the newspaper:</i></p> <p><i>-Notice of the Board meeting where financial results shall be discussed</i> <i>-publish the financial results which are approved in the Board Meeting</i> <i>-Notices given to Shareholders by advertisement</i></p>	<p><i>The Company is failed to Advertise in the newspaper Notice of Board Meeting, Financial results and Notice issued to Shareholders in the Newspaper.</i></p> <p><i>The Company is not complying with this regulation in every quarter.</i></p>

- (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, *however the trading in the Securities of the Company remain under suspension w.e.f. 14.05.2019;*
- (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.
01.	BSE Limited	Non-Payment of Outstanding Annual Listing Fees (ALF)	Show cause notice has been issued for non-payment	The Company is yet to reply on show cause notice issued by BSE Limited
02.	BSE Limited	Non-Payment of Outstanding Annual Listing Fees	Beneficiary Accounts of the Promoters remain frozen on account of non-payment of ALF	The Company is yet to pay the ALF.

Rahul Jain



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- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: The Company is taking action to comply with the Regulation applicable to the Company under SEBI (LODR), Regulations, 2015.

For Jain Rahul & Associates
Company Secretaries

Rahul Jain
(Proprietor)

ACS No. 41518

C.P. No. 15504

UDIN: A041518B000578714

Place: Udaipur
Date: 13/08/2020