



Oriental Trimex Limited

(An ISO 9001-2000 Certified Company)
Registered & Corporate Office : 26/25, Bazar Marg,
Old Rajender Nagar, New Delhi-110060
CIN : L74899DL1996PLC078339



31st May, 2025

To, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai, Maharashtra 400001	To, National Stock Exchange of India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai, Maharashtra 400051
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Sub.: Annual Secretarial Compliance Report for the financial year ended on 31st March, 2025

Dear Sir/Madam,

Pursuant to Regulation 24(A) of SEBI (Listing obligations Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Report dated 31st May, 2025 for financial year ended on 31st March, 2025 issued by M/s Aman Kesarwani & Associates, Practicing Company Secretaries, Secretarial Auditors of the Company.

We request you to take the above on record.

Thanking you.

For Oriental Trimex Limited

RAJESH KUMRA PUNIA
Managing Director
DIN: 00010289



**Secretarial Compliance report
of
Oriental Trimex Limited
for the financial year ended 31st March 2025**

I/~~We~~ have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s Oriental Trimex Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 26/25, BAZAR MARG, OLD RAJINDER NAGAR, NEW DELHI – 110060. Secretarial Review was conducted in a manner that provided me/~~us~~ a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my/our observations thereon.

Based on my/~~our~~ verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I/~~we~~ hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, Aman Kesarwani have examined:

- (a) all the documents and records made available to us and explanation provided by **Oriental Trimex 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 Report.

for the financial year ended 31st March 2025 ("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 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 Requirement) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 for the period under review.***
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; ***Not Applicable for the period under review.***
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; ***Not Applicable for the period under review.***
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) SEBI (Depository and Participants) Regulations, 2018
- (i) other regulations as applicable.

and circulars/ guidelines issued thereunder.

and based on the above examination, I/We hereby report that, during the Review Period:

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(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>Regulation/ Circular No.</i>	<i>Deviations</i>	<i>Action Taken by</i>	<i>Type of Action Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.</i>	<i>Details of Violation</i>	<i>Fine Amount</i>	<i>Observations /Remarks of the Practicing Company Secretary (PCS)</i>	<i>Management Response</i>	<i>Remarks</i>
1.	Every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year	Regulation 24A(2) of Securities and Exchange Board of India (LODR) Regulations, 2015	There was delay of 1 day in submission of compliance report.	NSE	Penalty of 2,360 was imposed on the Company	Company has delayed in submitting the Annual Compliance Report by one day	2,360	Company has delayed in submitting the Annual Compliance Report by one day	The Company will take necessary not repeat the violation in future.	-

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

<i>Sr. No.</i>	<i>Observations/Remarks Of the Practicing Company Secretary in the previous reports) (PCS)</i>	<i>Observations made in the secretarial compliance report for the year ended 31st March 2024</i>	<i>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</i>	<i>Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity</i>	<i>Remedial actions, if any, taken by the listed Entity</i>	<i>Comments of the PCS on the actions taken by the listed entity</i>
1.	The company delayed in filing the shareholding pattern for the first quarter ended June 2023. The due date 21 st July 2023, however the company delayed in filing the same it was actually filed on 03 rd August 2023 with a delay of 13 days	The company delayed in filing the shareholding pattern for the first quarter ended June 2023. The due date 21 st July 2023, however the company delayed in filing the same it was actually filed on 03 rd August 2023 with a delay of 13 days	The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities from time to time within the following timelines –	Fine imposed of INR 22,000	Company paid the penalty amount.	The penalty was paid as per the action taken by the Stock exchanges.

			(a) one day prior to listing of its securities on the stock exchange(s); (b) on a quarterly basis, within twenty one days from the end of each quarter; and, (c) within ten days of any capital restructuring of the listed entity resulting in a change exceeding two percent of the total paid-up share capital			
2.	The company delayed in submitting the certificate for the first quarter ended 30 th June 2023	The company delayed in submitting the certificate for the first quarter ended 30 th June 2023	Company to submit to the Stock Exchanges, audit report by a practicing company	-	-	In the current year, the company complied with the said regulation.

			secretary or qualified chartered accountant on a quarterly basis, for the purposes of reconciliation of the total issued capital, listed capital and capital held by depositories in dematerialized form , the details of changes in share capital during the quarter and in principle approval obtained by the issuer from all stock exchanges where it is listed in respect of such further issued capital.			
3.	Not complied with Regulation 8 of Securities and	Not complied with Regulation 8 of Securities and	The Board of director of every company, shall	-	-	No action taken

	Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information.			
4.	Company had failed to submit the information published in the newspaper to the Stock exchanges regarding the financial results.	Company had failed to submit the information published in the newspaper to the Stock exchanges regarding the financial results.	The listed entity shall publish the financial results in the newspaper simultaneously with the submission of the same to the stock exchange(s).	-	In current, the company has complied with the aforesaid regulation.	In the current year, the company complied with the said regulation.
5.	For the quarter ender June 2023 – the Company has failed to publish the compliance certificate.	For the quarter ender June 2023 – the Company has failed to publish the compliance certificate.	Filing of compliance certificate from Registrar and Transfer Agent (RTA) for dematerialization of shares	-	In current, the company has complied with the aforesaid regulation.	In current, the company has complied with the aforesaid regulation.
6.	For the quarter ender September 2023 – the Company had delayed	For the quarter ender September 2023 – the	Regulation 74(5) of SEBI (Depository and	-	In current, the company has complied with the	In current, the company has complied with the

	in publishing the compliance certificate.	Company had delayed in publishing the compliance certificate.	Participants) Regulations, 2018		aforesaid regulation.	aforesaid regulation.
7.	For the quarter ender December 2023 – the Company had delayed in publishing the compliance certificate.	For the quarter ender December 2023 – the Company had delayed in publishing the compliance certificate.	Regulation 74(5) of SEBI (Depository and Participants) Regulations, 2018	-	In current, the company has complied with the aforesaid regulation.	In current, the company has complied with the aforesaid regulation.

Disclosure under Section V-D of Chapter 5 of Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	Compliance with the following conditions while appointment/re-appointment of an auditor		
	i. If the auditor resigns within 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter. ii. If the auditor resigns after 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter as well as the next quarter.	NA	There were no instances of resignation by the auditors of the Company during the period under review.

	iii. if the auditor has signed the limited review/ audit report for the first three quarters of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year		
2.	Other conditions relating to resignation shall include:		
	Reporting of concerns by auditor with respect to the listed entity/its material subsidiary to the Audit Committee: i. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which may hamper the audit process, the auditor shall approach the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. ii. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents shall be brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor shall inform the Audit Committee of the	NA	The auditor has not raised any concern during the reporting period.

	details of information / explanation sought and not provided by the management, as applicable iii. the Audit Committee / board of directors, as the case may be, shall deliberate on the matter and communicate its views to the management and the auditor		
3.	Disclaimer in case of non-receipt of information		
	In case the listed entity/ its material subsidiary does not provide information required by the auditor, to that extent, the auditor shall provide an appropriate disclaimer in the audit report, which may be in accordance with the Standards of Auditing as specified by ICAI / NFRA.	NA	There were no such instances where the information required by the auditor were not provided.

I. I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/ No/NA)	Observations/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	-

2.	Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI.	Yes	
3.	Maintenance and disclosures on Website: - The listed entity is maintaining a functional website. - Timely dissemination of the documents/ information under a separate section on the website. - Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website	Yes	-
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	-

5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	The Company do not have any material or other subsidiary companies.
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes	-

9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	No	-
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	No	Dealt above

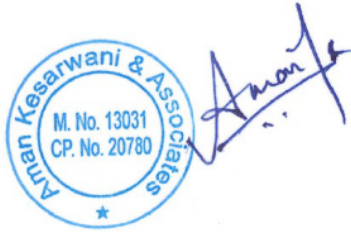
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	NA
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	No	Dealt above

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.
5. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to financial year ended March 31, 2025
6. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on random test basis.
7. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected

in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

For Aman Kesarwani & Associates
(Company Secretaries)
Peer Review No. 2777/2022



FCS Aman Kesarwani
M. No. 13031
CP No. 20780

UDIN: F013031G000518241
Place: New Delhi
Date: 31-05-2025