

Date: 29.06.2021

To,
Department of Corporate Services
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400001

Atishay Limited (Script Code: 538713/Script id: Atishay)

Subject: - Reg.24(A)-Annual Secretarial Compliance

Dear Sir/Madam

Pursuant to Regulation 24 (A) of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report duly issued by M/s Nilesh A. Pradhan & Co., LLP, Practicing Company Secretaries, for the financial year ended on March 31, 2021.

Thanking You

For Atishay Limited

Iti Tiwari

(Company Secretary & Compliance Officer)



ATISHAY LIMITED

Registered Office: - 14-15, Khatau Building, 44 Bank Street, Fort, Mumbai (MH) - 400001, Ph.: 022 49739081/82 Head Office: - 36, Zone-1, M.P.Nagar, Bhopal (MP) - 462011, Ph.: 0755-2558283, 4229195

admin@atishay.com www.atishay.com

CIN: L70101MH2000PLC192613

NILESH A. PRADHAN & CO., LLP Company Secretaries

Secretarial Compliance Report of Atishay Limited for the year ended 31st March, 2021

We Nilesh A. Pradhan & Co., LLP have examined:

- (a) all the documents and records made available to us for verification through electronic mode and explanation provided by Atishay 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 $31^{\rm st}$ March,2021 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;
- (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 there was no reportable event during the financial year under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

PRAJAKTA Signally signed by PRAJAKTA VASANT PADHYE SIGNED 2021.06.21 12.44.41 + 05/207

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable as there was no reportable event during the financial year under review)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable as there was no reportable event during the financial year under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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.	Compliance Requirement	Deviations	Observations/Remarks of the
No	(Regulations/ circulars /		Practicing Company Secretary
	guidelines including specific		
	clause)		
	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:

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Sr.No	Action taken	Details	of	Details	of	Observations/Remarks		
	by	violation		action	taken	of	the	Practicing
				e.g	fines,	Com	pany	Secretary if
				warning	3	any		
				letter,				
				debarm	ent			
				etc.				
NIL								

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

Sr.No	Observations of	Observations made	Action	Comments of the	
	the Practicing	in the Secretarial	taken by	Practicing	
	Company	Compliance Report	the listed	Company	
	Secretary in the	for the year ended	entity if	Secretary on the	
	previous reports.	31st March,2020	any	action taken by	
		The years are to be mentioned)		the listed entity.	
	Not Applicable				

For Nilesh A. Pradhan & Co., LLP Company Secretaries

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Prajakta Padhye Partner FCS No: 7478 COP No: 7891

PR:791/2020

UDIN: F007478C000490070

Place: Dombivali Date: 21st June,2021