



**Date: 30.05.2022**

**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, 2022.

Thanking You

**For Atishay Limited**

**Itri 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 31<sup>st</sup> March, 2022

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<sup>st</sup> March, 2022 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 there was no reportable event during the financial year 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 there was no reportable event during the financial year under review)





(e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not Applicable during the current financial year as no ESOP shares were issued);

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not Applicable during the current financial year);

(g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; (Not applicable to the company during the review period) and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not Applicable during the current financial year);

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

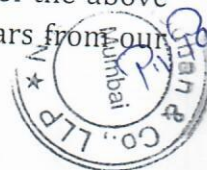
and circulars/ guidelines issued thereunder;

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. No	Compliance Requirement(Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
		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.



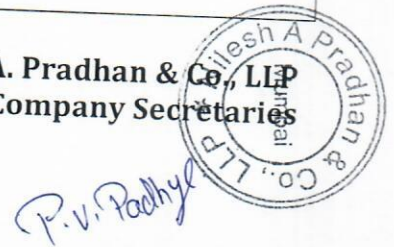
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

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
NIL				

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

Sr.No.	Observations of the Practicing Company Secretary in the previous reports.	Observations made in the Secretarial Compliance Report for the year ended —	Action taken by the listed entity if any	Comments of the Practicing Company Secretary on the action taken by the listed entity.
Not Applicable				

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



**Prajakta V. Padhye**  
**Partner**

FCS No: 7478

COP No: 7891

PR: 1908/2022

UDIN: F007478D000427403

Place: Mumbai  
Date: 30<sup>th</sup> May, 2022