1st Floor, Room No. - 107 1, Crooked Lane, Kolkata - 700 069 (Near Lalit Great.Eastern Hotel) Mobile: 9593339090

E-mail: ssmahataassociates@gmail.com

SECRETARIAL COMPLIANCE REPORT

Tower Investment & Trading Co. Ltd. 6, Old Post Office Street, 4th Floor, Kolkata-700 001 for the year ended 31st March, 2022 (Reg 24(A), SEBI LODR REG, 2015)

We, Mahata Agarwal & Associates Practicing Company Secretaries, have examined:

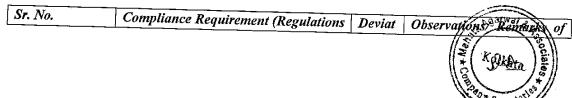
- a) all the documents and records made available to us and explanation provided by M/s Tower Investment & Trading Co. Ltd, ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity which is www.tower.net.in;
- d) all other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2022 ("Review Period"), in respect of compliance with the provisions of:
- e) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- f) 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) All other regulations as may be applicable and circulars/ guidelines issued thereunder;

And 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:-



/ Circulars/ specific clause)		including	ions	the Secre	Practicing etary	Company
	<u>1</u>	VIL.			· · · · · ·	

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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:

Sr. No.	Action Taken by	Details violation	of	Details taken warning debarm	e.g.	fines, letter,	of the	ns/remarks Practicing Secretary,
	<u> </u>		NII		ent, er		(ij uny)	

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

Sr. No.	Practicing Company Secretary in the previous	compliance report for the year ended 31st	by the listed	Practicing Secretary actions tak	the
	reports	March, 2021		listed entity	
		NIL NIL		usieu eniny	

Place: Kolkata Date: 23/05/2022

UDIN: A065249D000366297

For, MahataAgarwal& Associates Practicing Company Secretaries (Unique No: P2021WB088100)

(P.R No. 1998/2022

Partne

Membership No.-A65249 C.P. No.-24448

1st Floor, Room No. - 107 1, Crooked Lane, Kolkata - 700 069 (Near Lalit Great.Eastern Hotel) Mobile : 9593339090

E-mail: ssmahataassociates@gmail.com

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

(As per Clause C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 read with Regulation 34(3) of the said Listing Regulations)

To
The Members,
Tower Investment & Trading Co. Ltd.
"Temple Chambers"
6, Old Post Office Street,
4th Floor, Kolkata-700 001

As required by item 10(i) of Part C of Schedule V of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015, I hereby certify that none of the Directors on the Board of M/s Tower Investment & Trading Co. Ltd. (CIN: L67120WB1981PLC033500) have been debarred or disqualified from being appointed or continuing as Directors of Companies by the SEBI/Ministry of Corporate Affairs or any such statutory authority.

Place: Kolkata Date: 18/05/2022

UDIN: A065249D000341404

For, Mahata Agarwal & Associates Practicing Company Secretaries (Unique No: P2021WR088100)

(P.R No. 1998/2022)

Dipa Agarwal

Partner

Membership No.-A65249

C.P. No.-24448