



**SECRETARIAL COMPLIANCE REPORT**

Tower Investment & Trading Co. Ltd.

6, Old Post Office Street, 4th Floor, Kolkata-700 001

**for the year ended 31<sup>st</sup> 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](http://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 31<sup>st</sup> 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:-

Sr. No.	Compliance Requirement (Regulations)	Deviat	Observations
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	<i>/ Circulars/ Guidelines including specific clause)</i>	<i>ions</i>	<i>the Practicing Company Secretary</i>
NIL			

- 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:

<i>Sr. No.</i>	<i>Action Taken by</i>	<i>Details of violation</i>	<i>Details of action taken e.g. fines, warning letter, debarment, etc.</i>	<i>Observations/remarks of the Practicing Company Secretary, (if any)</i>
NIL				

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

<i>Sr. No.</i>	<i>Observations of the Practicing Company Secretary in the previous reports</i>	<i>Observations made in the secretarial compliance report for the year ended 31st March, 2021</i>	<i>Actions taken by the listed entity, if any</i>	<i>Comments of the Practicing Company Secretary on the actions taken by the listed entity</i>
NIL				

Place: Kolkata  
Date: 23/05/2022

UDIN: A065249D000366297

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

(P.R No. 1998/2022)

  
  
Dipa Agarwal  
Partner

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



**Mahata Agarwal & Associates**

**COMPANY SECRETARIES**

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: P2021WB088100)**

**(P.R No. 1998/2022)**

  


**Dipa Agarwal**

**Partner**

**Membership No.-A65249**

**C.P. No.-24448**