

**Ref: D/CTL/SE/2025-26/04****May 17, 2025**

To,  
BSE Limited  
P J Towers, Dalal Street,  
Fort, Mumbai -400001

**SCRIP CODE: 538476****ISIN: INE172D01021****Scrip ID: CTL**

**SUB.: SUBMISSION OF ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED MARCH 31, 2025 PURSUANT TO REGULATION 24A OF THE SEBI (LISTING OBLIGATION AND DISCLOSURE REQUIREMENTS) REGULATION, 2015**

Dear Sir/Madam,

This is to inform you that pursuant to Regulations 24A of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, we are submitting herewith the Annual Secretarial Compliance Report of the company for the Financial Year Ended March 31, 2025 issued by M/s Atiuttam Singh & Associates (PR No. S2014DE270600), Practicing Company Secretaries.

You are requested to take the same on your record.

Your Sincerely,  
For **Capital Trade Links Limited**

**Vinay Kumar Chawla**  
**Whole Time Director**  
**DIN: 02618168**



**SECRETARIAL COMPLIANCE REPORT**  
**CAPITAL TRADE LINKS LIMITED**  
**For the financial year ended on 31<sup>st</sup> March 2025**

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **CAPITAL TRADE LINKS LIMITED** having CIN L51909DL1984PLC019622 (hereinafter referred as 'the listed entity'), having its Registered Office at 102-103, First Floor, Surya Kiran Building, 19 K. G. Marg, Connaught Place, New Delhi - 110001. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on 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, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, Atiuttam Prasad Singh, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by M/s **CAPITAL TRADE LINKS 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 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 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 during the year under review.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not Applicable during the year under review.**



*Atiuttam Singh & Associates*  
Company Secretaries

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable during the year under review.**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not Applicable during the year under review.**

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

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

(i) other regulations as applicable and circulars/ guidelines issued thereunder;

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/ circulars/ guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken By	Type of Action (Advisory/Clarification/Fine/Show Cause Notice /Warning etc.)	Details of Violation	Fine Amount (Rs.)	PCS Remarks	Management Remarks	Remarks
1.	Income Tax demand order received via e-mail on 29 <sup>th</sup> March 2025 required to be disclosed to BSE within 24 hours.	Regulation 30(2) read with Part A of Schedule III of SEBI (LODR) Regulation, 2015	31 hours delay in uploading the intimation.	-	-	Disclosure w.r.t the order passed u/s 147 of Income Tax Act, 1961 for FY 2020-21 and 2021-22 by Income Tax Department received on 29 <sup>th</sup> March 2025 at 12:47 PM intimated to BSE on 31 <sup>st</sup>	-	-	Company was not working on (Saturday) 29 <sup>th</sup> March 2025 and (Sunday) 30 <sup>th</sup> March 2025.	-



						March 2025 at 07:08 PM i.e. within 55 hours of receipt.				
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action taken By	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning etc.)	Details of Violation	Fine Amount (Rs.)	PCS Remarks	Management Remarks	Remarks
1.	Proceeding of AGM dated 16 <sup>th</sup> August 2023 required to be disclosed to BSE within 12 hours.	Reg. 30(6) (ii) of SEBI (LODR) Regulation, 2015	12 hours delay in uploading of Proceeding of AGM.	BSE	Clarification	Proceeding of AGM dated 16 <sup>th</sup> August 2023 concluded at 12:00 PM and submitted to BSE on 17 <sup>th</sup> August 2023 at 11:59 AM i.e. within 24 hours of conclusion.	-	-	Oversite	-

I hereby report that, during the Review Period the compliance status of the listed entity with the following requirements:



Sr. No.	Particulars	Compliance (Yes/No/ NA)	Status	Observations/ Remarks by PCS
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable	Yes		-
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes  Yes		-  -
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/information under a separate section on the website</li><li>Web-links provided in annual corporate</li></ul>	Yes  Yes  Yes		-  -  -



	governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website		
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries	NA NA	- -
6.	<b>Preservation of Documents:</b> 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.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start	Yes	-





	of every financial year/during the financial year as prescribed in SEBI Regulations.		
<b>8.</b>	<b>Related Party Transactions:</b> a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved /ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	<b>Yes</b>  <b>NA</b>	-  All related party transactions was executed with the prior approval of Audit Committee.
<b>9.</b>	<b>Disclosure of events or information:</b> 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.	<b>Yes</b>	-
<b>10.</b>	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	<b>Yes</b>	-





<b>11.</b>	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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 except as provided under separate paragraph herein (*).	<b>No</b>	-
<b>12.</b>	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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.	<b>No</b>	
<b>13.</b>	<b>Additional Non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	<b>No</b>	-





**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 certify 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

**For Atiuttam Singh & Associates  
Company Secretaries**

ATIUTTAM  
PRASAD  
SINGH

Digitally signed by  
ATIUTTAM PRASAD  
SINGH  
Date: 2025.05.16  
20:10:37 +05'30'

**Atiuttam Prasad Singh**  
*Proprietor*

**Membership No.:F8719**  
**CP No.:13333**  
**PR No.: S2014DE270600**

**UDIN: F008719G000364745**

Date: 16<sup>th</sup> May 2025  
Place: New Delhi