



CS JITENDRA R. BHAGAT

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BHAGAT ASSOCIATES.

Company Secretary

2/1417-18, "URABH HOUSE", HANUMAN SHERI, SAGRAMPURA, RING ROAD, SURAT -395002

Annual Secretarial Compliance Report of GHUSHINE FINTRRADE OCEAN LIMITED For the year ended 31st March, 2022

I/We JITENDRA R. BHAGAT, Proprietor of Bhagat Associates, Practicing Company Secretary have examined:

(a) all the documents and records made available to us and explanation provided by
GHUSHINE FINTRRADE OCEAN LIMITED CIN: L65910GJ1995PLC025823
SCRIPTCODE 539864 ("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 **31st 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;

(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) (other regulations as applicable)

and circulars/ guidelines issued there under; and based on the above examination, I/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 there under, 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
1.	Stand alone results SEPTEMBER HALF-2020	CASHFLOW STATEMENT NOT RECEIVED IN PDF	NO COMMENTS
2.	Stand alone results SEPTEMBER HALF-2020	RESULT PDF NOT SIGNED	NO COMMENTS
3.	Stand alone results SEPTEMBER HALF-2020	STATEMENT OF ASSETS AND LIABILITY NOT SUBMITTED	NO COMMENTS
4.	Stand alone results MARCH 2021	AUDITORS REPORT SUBMITTED WITH WRONG COMPANY NAME AND NOT IN PDF FORMAT	NO COMMENTS
5.	Stand alone results MARCH 021	CASHFLOW STATEMENT NOT RECEIVED IN PDF	NO COMMENTS
6.	Stand alone results MARCH 2021	DECLARATION OR STATEMENT OF IMPACT OF AUDIT QUA:IFICATION S NOT SUBMITTED	NO COMMENTS
7.	Stand alone results MARCH 2021	IN PDF FINANCIAL RESULTS FOR YEAR ENDED NOT GIVEN	NO COMMENTS
8.	Consolidated results MARCH 2021	ONLY AUDIT REPORT SUBMITTED	NO COMMENTS

- (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/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.
1.	BSE	FOR VIOLATION OF SEBI LODR REGULATIONS 17 TO 27	FINES LEVIED PURSUANT TO PROVISION OF SEBI SOP CIRCULAR RS. 2731580/- AS ON 05.05.2016 NOT PAID	
2.	BSE	NON PAYMENT OF ANNUAL LISTING FEES AND REGULATION 33 OF SEBI LODR	SUSPENSION OF TRADING	

(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 31 st March, 20 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	VIOLATION OF SEBI SOP CIRCULAR AND LEVY OF FINE RS. 2731580/- AS ON 05.05.2016		COMPANY HAS COMPLETED FILING OF VARIOUS NON COMPLAINTS AND REQUESTED BSE TO WAIVE PENALTY	FINE IS STILL NOT PAID
2.	NON PAYMENT OF ANNUAL LISTING FEES FOR FY 2020-21 RS 29500/-		COMPANY HAS PAID	No comments
3.	REINSTATEMENT FEES OF RS. 75000/-+ GST		COMPANY HAS APPLIED FOR REVOCATION OF SUSPENSION OF TRADING	STILL NOT PAID
4.	NOT HAVING FUNCTIONAL WEBSITE REGULATION 46		NO ACTION TAKEN BY COMPANY	WEBSITE IS STILL NOT FUNCTIONAL
5.	SUSPENSION OF TRADING LEVY OF PROCESSING FEES OF RS 29500/-+ GST		COMPANY HAS APPLIED FOR REVOCATION OF SUSPENSION OF TRADING	NO COMMENTS



(Note:

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.
 - Annexure-1 containing remarks for previous year is attached herewith.
2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations.
 - As informed to us by the management No such observations were made by the PCS in their secretarial Audit Report for the period prior to the previous financial years.

Place: SURAT

Date: 27.05.2022



For **BHAGAT ASSOCIATES**
COMPANY SECRETARY

J. R. Bhagat

(J. R. BHAGAT)
PROPRIETOR

M. No. FCS - 3032 CP No. 1311

UNIQUE CODE NO. S1995GJ014500

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