Annual Secretarial Compliance Report of M/s Premium Merchants Limited
For the year ended March 31, 2022

To,

M/s Premium Merchants Limited
Omaxe Square, Plot No. 14,
5th Floor, Jasola District Centre,
New Delhi-110025

M/s Vishal Arora & Associates, Company Secretaries, have examined:

(a) All the documents and records made available to us and explanation provided by **M/s Premium Merchants Limited** ("the listed entity"),

(b) The filings/submissions made by the listed entity to the stock exchanges, i.e. (MSE) Metropolitan Stock Exchange of India Limited.

(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 March 31, 2022 ("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 **(Not applicable on company during review period)**;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018 **(Not applicable on company during review period)**;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable on company during review period)**;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable on company during review period)**;

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not applicable on company during review period)**;

(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;

(j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(k) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.

and circulars/ guidelines issued thereunder;

and based on the above examination, 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.

(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 our examination of those records.

(c) The company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.

(d) 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

(e) Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder: -

S. No	Actions Taken By	Details of Violation	Details of actions taken E.g.: Fines, warning letter, debarment, etc	Observation/remarks of Practicing Company Secretary, if any
NIL	NIL	NIL	NIL	NIL

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

S. No	Observations of the Practicing Company Secretary in previous report	Observations made in secretarial compliance report for the year ended March, 31st 2022	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL			

Notes:

1. Due to restricted movement amid COVID-19 pandemic, we conducted the secretarial audit by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct.

2. This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to Financial Year 2021- 22. We are not commenting on the Statutory Compliances whose due dates are extended by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.

VISHHAL ARORAH

Digitally signed by VISHHAL ARORAH
DN: c=IN, o=Personal, 2.5.4.20=1f567225cc816380b46c3af6ae991939ed0ad13b273249194d28d4724c27e106, postalCode=201010, st=UTTAR PRADESH, serialNumber=ec0001e84920032279950b90364d420767dca7a427b0946a5fdab77ef134d5f4, cn=VISHHAL ARORAH, l=GHAZIABAD, title=7020, pseudonym=70202020121915490650 9
Date: 2022.05.13 15:00:03 +05'30'

Vishhal Arorah

Proprietor

M. No. 5958; C P No.: 5992

UDIN: F005958D000316763

PR No. 967/2020

Place: New Delhi

Date: May 13, 2022