MACK TRADING COMPANY LIMITED

5-C, SINDHU HOUSE, 3RD FLOOR, NANABHAI LANE, FLORA FOUNTAIN, FORT, MUMBAI 400 001. CIN: L51900MH1980PLC022532 Tel.No. 22047644/22047404. E-mail:info@macktradingcompany.com

29th May, 2019

To.

The Secretary,
Bombay Stock Exchange Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001.

Sub: Certificate for non-applicability of Annual Secretarial Compliance Report as required under the SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019.

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BSE Code: 501471

Dear Sir,

The Securities and Exchange Board of India has amended Listing Obligations and Disclosure Requirements Regulation, 2015 and included 24A Regulation as under:

"24A: Secretarial Audit

Every Listed Company and its material unlisted subsidiaries Incorporated in India shall undertake secretarial audit and shall annex with its annual report, a secretarial audit report, given by a Company Secretary in Practice, in such form as may be prescribed with effect from the year ended March 31, 2019."

Further as per SEBI's Circular the annual Secretarial Compliance Report shall be submitted by the Listed entity to the Stock Exchanges within 60 days of the end of the Financial Year.

However as per Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the compliance with the provisions as specified in regulations 17,17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clause (b) to (i) of sub-regulation (2) of regulation 46 and Para C, D and E of Schedule V shall not apply;

- (a) To the listed entity having paid up equity share capital not exceeding rupees ten crore and net worth not exceeding rupees twenty five crores, as on the last day of the previous financial year.
- (b) The Listed entity which has listed its specified securities on the SME Exchange.

As per exemption given under Regulation 15(2)(b) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, the requirement of submission of Secretarial Compliance Report is not applicable to the Company.



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-2-

In view of the above, the Company is exempted under Regulation 15(2) of SEBI (LODR) Regulations, 2015 and consequently the Company is also exempted from submitting the Annual Secretarial Compliance Report for the year ended 31.03.2019 to the Stock Exchange.

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Kindly take the same on record.

Thanking you,

Yours faithfully, For MACK TRADING COMPANY LTD.

Vikas Pavankumar (Director) SOMBAY SE