REAL GROWTH CORPORATION LIMITED

(Formerly Real Growth Commercial Enterprises Limited)

CIN: L70109DL1995PLC064254

Date: 29/05/2024

Add: G-01, Ground Floor, Plot No. SU, LSC B-Block, RG City Centre, Lawrence Road Delhi North West DL 110035 E-mail: <u>info@realgrowth.in</u> Website: <u>www.realgrowth.co.in</u> Ph. 9560096060

The Manager Department of Corporate Relationship BSE Limited 25th Floor P.J. Towers, Dalal Street Mumbai – 400001

SCRIP CODE: 539691 (Equity

Sub.: Annual Secretarial Compliance Report for the year ended March 31, 2024.

Dear Sir/Madam

Please find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2024 under Regulation 24A of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/ CFD/ CMDI/ 27/ 2019 dated February 8, 2019.

Kindly, take the above on record.
hanking You,
Yours Faithfully,
For Real Growth Corporation Limited

Archana Pundir Company Secretary



Sachin Kumar Shrivastva

Company Secretary

Peer Reviewed Practicing Unit Registration No. 2346/2022

Secretarial Compliance Report of Real Growth Corporation Limited for the financial year ended 31st March, 2024.

I Sachin Kumar Shrivastva have examined:

- a) all the documents and records made available to us and explanation provided by Real Growth Corporation Limited ("the listed entity" formerly known as Real Growth Commercial Enterprises Limited),
- 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, 2024 ("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) (No events during the year).
- 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). (No events during the year).
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not Applicable)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable)
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (No events during the year).
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;



I hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	Secretarial Standards: 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	Adoption and timely updation of the Policies: All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	
	 All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations /circulars /guidelines issued by SEBI 	Yes	
3	Maintenance and disclosures on Website:		
	The Listed entity is maintaining a functional website	Yes	
	• Timely dissemination of the documents/ information under a separate section on the website	Yes	
	Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	
4	Disqualification of Director:		
	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.	Details related to Subsidiaries of listed entities have been examined w.r.t.:		
	a) Identification of material subsidiary companies	Yes	
	b) Disclosure requirement of material as well as other subsidiaries	Yes	
6.	Preservation of Documents:		
	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.	Performance Evaluation:		
	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8.	Related Party Transactions:		
	a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	
	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.	Yes	
9	Disclosure of events or information: 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.	Yes	There is delay in disclosure of some events during the year under review.
10	Prohibition of Insider Trading:		The Company has instal SDD software
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI	Yes YUMAR S	instal SDD software and recorded the necessary information. However, inspection
		C.P. No.: 21874	

	(Prohibition of Insider Trading) Regulations, 2015.		for the accuracy of data by the exchange is still in process and the company has marked SDD non- compliant.
11	Actions taken by SEBI or Stock Exchange(s), if any: 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 (**).	Yes	Detailed in separate paragraph of this report.
12	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	N.A.	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Compliances with the following condit		
1.	 i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or 	NA NA	There was no incidence of resignation of statutory auditors form the listed entity and its material subsidiaries during the period under review.
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	C.P. No.: 21674

2.	Other conditions relating to resignation	of statutory auditor
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	NA
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA
	b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.	NA
	c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	NA
	ii. Disclaimer in case of non-receipt of information:	C.P. NO.: 21874*

	The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 th October, 2019.	NA

(a) The listed entity has done various non-compliances and delay in making compliances with the provisions of the above Regulations and circulars/guidelines issued thereunder, some of the observation is hereunder:

Sr	Complia	Regulat	Deviati	Acti	Тур	Details	Fine	Observat	Manage	Rema
	nce	ion/	ons	on	e of	of	Amo	ions/	ment	rks
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			Report			on 31st		by 19		
			for the			March		days.		
			FY			2023				
			2022-			was				
			23.			filed to		KUMAR		
						SE on		S no	150	
						19.06.2		8	1	

					with delay by 19 days.			
2.	Declarati on and submissi on of quarterly and year to date financial results within 60 days from the end of the 4 th quarter.	Regulat ion 33(3)(a) of the SEBI (LODR), 2015	ly and year to			Financial Result for the quarter and financial year ended on 31.03.20 24 is not filed till the date of issuing of this report.	of the financial result on	

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

Assumptions and Limitation of scope and review

- I. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- II. Our responsibility is to certify based on my examination of relevant documents and information.
- III. I have not verified the correctness and appropriateness of financial records and books of accounts of the listed entity.
- IV. This report is solely for the intended purpose of compliance in terms of regulations 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance of the future viability of the listed entity nor the efficacy or effectiveness with which management has conducted the affairs of the listed entity.

Sachin Kumar Shrivastva Company Secretary in Practice ACS:55362

CP: No. 21674

UDIN: A055362F000471459 PR No. I2019UP1923700

Date: 28.05.2024

Place: Vaishali, Ghaziabad

Annexure A

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

Sr N o.	Complia nce Require ment (Regulat ions/ circulars / guidelin es includin g specific clause)	Regulati on/ Circular No.	Deviatio ns	Acti on Tak en by	Typ e of Acti on	Details of Violatio n	Fine Amo unt	Observa tions/ Remarks of the Practicin g Compan y Secretar y	Manage ment Respons e	Rem
1	Disclos ure of sharehol ding pattern within 21 days from the end of the quarter.	Regulation 31(1)(b) of SEBI (LODR) , 2015	Delay in submissi on of sharehol ding pattern for the quarter ended on 31st March 2022, 30th June 2022 and 30th Septemb er 2022			Non-complia nce of Regulati on 31(1)(b) of SEBI (LODR) Regulati ons, 2015 regardin g delay in submissi on of sharehol ding pattern for the quarter ended on 31st March 2022, by 285 days, for quarter ended on 30th June 2022 by 194 days and for quarter		The sharehol ding pattern for the 31st March 2022, 30th June 2022 and 30th Septemb er 2022 has been submits to the stock exchang e after a huge delay from the period specifie d under Regulati on 31(1)(b) of the SEBI (LODR) Regulati ons, 2015	Delay were occurred due to unavoida ble circumst ances during March 2022 quarter audited results.	A A WAS WAS WAS WAS WAS WAS WAS WAS WAS

2. Subi	niss Regulati	Non	ended on 30 th Septemb er 2022 by 102 days. Non	The	This is	
ion quar y com nee repo on corp e gove nee with 21 from end quar	of on 27(2)(a) of SEBI (LODR) , 2015 rt orat in days a the of	Complia nce of Regulati on 27(2)(a) for the quarter ended on 31 st March 2022, 30 th June,202 2, 30 th Septemb er 2022 and 31 st Decemb er 2022.	Complia nce of Regulati on 27(2)(a) for the quarter ended on 31 st March 2022, 30th June,202 2, 30th Septemb er 2022 and 31 st Decemb er 2022.	Compan y has not submitted d quarterly y complia nce report for the quarter ended on on 31st March 2022, 30th June,202 2, 30th Septemb er 2022 and 31st Decemb	not applicable on company as networth is less than prescribed and BSE too has accepted this.	
3. Declion submitted final large with 60 of from end the final large with 1 years.	and on 33 of the SEBI (LODR) , 2015 in days a the of	Delay in submissi on of Audited financial Result for the year ended on 31st March, 2022.	Non-complia nce of Regulati on 33 of SEBI (LODR) Regulati ons, 2015 regardin g delay in submissi on of Audited financial result for the financial year ended on 31st March, 2022 by	for the financial year ended on 31st March, 2022 were submitte d to stock exchang e on 18th January 2023 after a delay of 234 days against the period	Delay were occurred due to unavoida ble circumst ances.	

				234 days.	d under Regulati on 33(3)(d) of the SEBI		
					(LODR) Regulati ons, 2015		
4.	Declaration and submiss ion of quarterly financial results within 45 days from the end of the quarter.	Regulati on 33(3)(a) of the SEBI (LODR) , 2015	Delay in submissi on of quarterl y financial results along with limited review report for the 1st and 2nd Quarter of the financial year 2022-23	Quarterly financial results along with limited review report for the 1st and 2nd Quarter of the financial year 2022-23 was submits on 27th January 2023.	Delay in submissi on of Quarterly financial results along with limited review report 1st Quarter-196 days delay. 2nd Quarter-104 Days delay.		
5	Submiss ion of stateme nt of Investor s complai nts within 21 days from the end of the quarter.	Regulati on 13(3) of SEBI (LODR) , 2015	Delay in submissi on of quarterl y statemen t of Investor s complai nts for the quarter ended on 31st March 2022, 30th June, 2022, 30th Septemb	Quarterly y statemen t of Investor s Complai nt for the 4th Quarter of FY 2021-22, and 1st and 2nd Quarter of FY 2022-23 has been submitte d on 17th January 2023.	Delay in submissi on of quarterl y statemen t of Investor s complai nts Quarter ended on 31st March 2022-Delay by 271 days Quarter ended on	BS C.P. No.: 218	

6 Disclos ure of related party transacti ons with 15 days form the publicat ion of its standalo ne and consolid ated financia 1 stateme nt on every six months.	of SEBI (LODR) , 2015	y has not filed disclosu re of related party transacti ons for the half year ended on 31st March 2022 and 30th Septemb er 2022	The compan y has not filed disclosu re of related party transacti ons for the half year ended on 31st March 2022 and 30th Septemb er 2022	30 th June 2022 - Delay by 179 days Quarter ended on 30 th Septemb er 2022 - Delay by 87 days Quarter ended on 31 st Decemb er 2022 - Delay by 14 days	This is not applicable on company as networth is less than prescribe d limit.	
7 Complia nce certifica te regardin g appoint ment of share transfer agent	on 7(3) of SEBI (LODR) , 2015	Delay in submissi on of complia nce certificat e for the financial year ended on 31st	Complia nce certificat e regardin g appoint ment of share transfer agent has been	There was a delay of 269 days in submissi on of the certificat e to the stock exchang e.	HUMAR S	A STATE OF THE STA

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