



**RAUNAQ INTERNATIONAL LIMITED**  
(Formerly Known as Raunaq EPC International Limited)

RIL/SEC/BSE/4/MAY 2024-2025

May 30, 2024

**The Manager (Listing)**  
**BSE Limited**  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building  
PJ Towers, Dalal Street  
Fort, Mumbai – 400001

**STOCK CODE: 537840**

**Sub: “Annual Secretarial Compliance Report” for the year ended March 31, 2024**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019 issued by the Securities and Exchange Board of India (SEBI), please find enclosed herewith **“Annual Secretarial Compliance Report” for the year ended March 31, 2024** issued by M/s Etika Aggarwal & Associates, Practicing Company Secretaries, Delhi.

You are requested to take the same on your records.

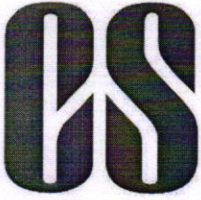
Thanking you,

Yours faithfully  
For **Raunaq International Limited**  
(Formerly known as Raunaq EPC International Limited)

  
**Neha Patwal**  
Company Secretary and (CFO)



Encl: As Above



# ETIKA AGGARWAL AND ASSOCIATES

Company secretaries

ANNUAL SECRETARIAL COMPLIANCE REPORT OF  
RAUNAQ INTERNATIONAL LIMITED  
(Formerly known as Raunaq EPC International Limited)  
(For the financial year ended 31<sup>st</sup> March, 2024)

To,  
Raunaq International Limited  
(Formerly known as Raunaq EPC International Limited)  
20 K.M. Mathura Road  
P.O. Box 353, P.O. Amar Nagar  
Faridabad-121 003 (Haryana)

I, Etika Aggarwal, Proprietor of M/s Etika Aggarwal and Associates, Practising Company Secretaries have examined:

- all the documents and records made available to us and explanation provided by Raunaq International Limited ("the Company"),
- the filings/submissions made by the Company to the stock exchange,
- website of the Company,
- other document/filing, as may be relevant, which has been relied upon to make this certificate,

for the financial year ended 31<sup>st</sup> March, 2024 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;-**Not applicable during the year under review.**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not applicable during the year under review.**
- 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.**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

Registered office: E-38,Second floor, Guru nanak road, Adarsh Nagar, Delhi-110033

Email:fcsetikaaggarwal@gmail.com, Mobile no.: +91-8368685731

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Aggarwal  
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by Etika  
Aggarwal  
Date: 2024.05.27  
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>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</p> <p>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</p> <p>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.</p>	NA	-
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>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</p>	NA	-

	<p>Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>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.</p> <p>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.</p>		
	<p>ii. Disclaimer in case of non-receipt of information:</p> <p>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.</p>	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 18th October, 2019	NA	-
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j) Other Regulations as applicable and circulars/guidelines issued thereunder

and based on the above examination, I hereby report that, during the Review Period:  
I. (a) The Company 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	Detail of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
-	-	-	NA	NA	-	-	-	-	-	-

(b) The Company has taken the following actions to comply with the observations made in previous reports:

NIL

Sr.No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Detail of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
-	-	-	NA	NA	-	-	-	-	-	-

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

**Note: 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 were not applicable to the Company during the review period.**

(a) Following are the additional affirmations pursuant to BSE Circular no. 20230316-14 dated March 16, 2023 and Circular no. 20230410-41 dated April 10,2023

III. I hereby report that, during the review period the compliance status of the Company is appended as below:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<b><u>Secretarial Standards:</u></b> The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	
2.	<b><u>Adoption and timely updation of the Policies:</u></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 Company</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"> <li>• The Company 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 governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website</li> </ul>	Yes	
4.	<b><u>Disqualification of Director:</u></b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5.	<b><u>Examined the Details related to Subsidiaries of the Company:</u></b> <ul style="list-style-type: none"> <li>(a) Identification of material subsidiary companies</li> <li>(b) Requirements with respect to disclosure of material as well as other subsidiaries</li> </ul>	NA	
6.	<b><u>Preservation of Documents:</u></b>	Yes	

	The Company 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		
7.	<b><u>Performance Evaluation:</u></b> The Company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
8.	<b><u>Related Party Transactions:</u></b> (a) The Company has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	
9.	<b><u>Disclosure of events or information:</u></b> The Company has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	
10.	<b><u>Prohibition of Insider Trading:</u></b> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b> No Actions taken against the Company/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	Yes	
12.	<b><u>Additional Non-compliances, if any:</u></b>	Yes	

**Etika Aggarwal and Associates**  
Company Secretaries

*Continuing sheet...*

	No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.		
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**For ETIKA AGGARWAL & ASSOCIATES**

Etika  
Aggarwal

Digitally signed by Etika  
Aggarwal  
Date: 2024.05.27 14:59:02  
+05'30'

Place: Delhi  
Date: 27.05.2024

**ETIKA AGGARWAL**

**Proprietor**

**M No.: F12260**

**CP No.: 18788**

**PRC. No: 5708/2024**

**UDIN:**

**F012260F000452975**

