



## **RAGHUVIR SYNTHETICS LIMITED**

REGD. OFF. : RAKHIAL ROAD, RAKHIAL, AHMEDABAD-380 023, INDIA

PHONE : 079-22911015 - 22911902 - 22910963

Email : raghuvirad1@sanchamet.in

Website : <http://www.raghuvir.com>

CIN : L17119GJ1982PLC005424

Date: 29/06/2021

To  
The Manager  
Department of Corporate Services  
BSE Ltd.  
Dalal Street, Fort  
Mumbai - 400 001

Sub. - : Submission of Revised Annual Secretarial Compliance Report under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 for the year ended 31st March, 2021

Ref. - : Scrip Code - 514316

Sir / Madam,

This with respect to our submission dated 26.06.2021, Please find enclosed herewith the Revised Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2021 received from Mr. Alpesh Paliwal, Proprietor of M/s. Paliwal & Co. (Formerly Known as Alpesh Dhandhlya & Associates), Practicing Company Secretary, Ahmedabad, having COP NO. 12119, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019.

Kindly take the revised Annual Secretarial Compliance Report on your records and acknowledge the receipt.

Thanking you,

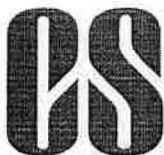
Yours faithfully,

FOR RAGHUVIR SYNTHETICS LIMITED  
FOR, RAGHUVIR SYNTHETICS LIMITED

  
DIRECTOR/AUTHORISED SIGNATORY

SUNIL R. AGARWAL  
CHAIRMAN & MANAGING DIRECTOR  
DIN : 00265303

Encl: as above



**Paliwal & Co.**  
**(Formerly Known as**  
**Alpesh Dhandhlya & Associates)**  
**Company Secretaries**

Office: 401, Haash Complex, Nagri Hospital-Law Garden Road, Nr. Ellise Bridge Police Line, Ahmedabad-380006  
Email Ids. [welcome2pcs@gmail.com](mailto:welcome2pcs@gmail.com), [alpesh.pcs@gmail.com](mailto:alpesh.pcs@gmail.com), Ph. 079 - 48980181, Contact Nos. 8000133307

**Annual Secretarial Compliance Report of Raghuvir Synthetics Limited for  
the year ended 31/03/2021**

I have examined:

- (a) All the documents and records made available to us and explanation provided by **M/s. RAGHUVIR SYNTHETICS LIMITED** (herein after called "the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges, except with the Calcutta Stock Exchange limited as detailed hereinunder (i) (c),
- (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 **31<sup>st</sup> March, 2021** ("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 there under ;and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 to the Company during the Reporting Period);**



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**Company Secretaries**

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- (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 to the Company during the Reporting Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the Company during the Reporting Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Reporting Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the Reporting Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Company has complied with clause 6(A) and 6(B) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations") of the SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019.

And based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India, I 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



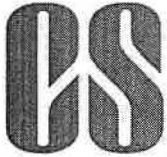
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Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
	Not Applicable	Not Applicable	Not Applicable

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my 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 there under:

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	The Calcutta Stock Exchange Limited	The Company is suspended from Calcutta Stock Exchange Limited. (However the suspension from Calcutta stock exchange Limited is not occurred during audit period)	The Status of the company in Calcutta Stock Exchange is "SUSPENDED". The company has applied and paid fee(s) for revocation of suspension and submitted the documents and compliances as required by Calcutta Stock Exchange for revocation of suspension. The company has also paid the annual listing fees to Calcutta Stock Exchange. The	The action of revocation of suspension is pending respect to actions to be taken at the end of Calcutta Stock Exchange Limited



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			process of revocation of suspension is pending respect to actions to be taken at the end of Calcutta Stock Exchange Limited.	
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- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Observations of Practicing Company Secretary in Previous Reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

**Date: 29.06.2021**  
**Place: Ahmedabad**

**For, Paliwal & Co.**  
**(Formerly Known as**  
**Alpesh Dhandhlya & Associates)**  
**Company Secretaries**

ALPESH  
RAMESHBHAI  
PALIWAL

Digitally signed by Alpesh Rameshbhai Paliwal, DN: cn=Alpesh Rameshbhai Paliwal, o=Paliwal & Co., ou=Company Secretaries, email=alpesh.pcs@gmail.com, c=IN, date=2021.06.29 11:00:18 +05'30'

**Alpesh Paliwal**  
**Proprietor**  
**COP: 12119**

**UCN: I2013GJ1046200**

**Peer Review Registration Number: 508/2017**

**UDIN: A032500C000534254**