



To,
BSE Limited
P.J Towers, Dalal Street,
Mumbai - 400001

Date:30.07.2020

Dear Sir/Ma'am,

Sub: Submission of Annual Secretarial Compliance Report for the year ended
31.03.2020

In terms of clause 3(b)(iii) of the SEBI circular - CIR/CFD/CMD1/27/2019 dated
February 8, 2019, please find enclosed Annual Secretarial Compliance Report of the
Company for the year ended March 31st, 2020 issued by M/s. S.S. Reddy &
Associates, Practicing Company Secretaries.

We request you to kindly take the above on record.

For Ravileela Granites Limited

P. Samantha Reddy
Wholetime Director and CFO
DIN: [00141961](#)

H.No. 6-3-668/10/35
Durganagar Colony
Punjagutta, Hyderabad - 500 082.

Ravi Beela
GRANITES LTD

CIN#L14102AP1990PLC011909
Tel : 23413733, Fax : 23413732
E-mail : ravileel@yahoo.com

Regd. Office : SAMPANNABOLU (V), SHAMEERPET (M), MEDCHAL DIST.
FACTORY ADD: PLOT NO. 15 APBC SPSEZ ANNANGI VILLAGE MADDIPADU MANDAL PRAKASAM DIST



S.S. Reddy & Associates

Practicing Company Secretaries

Secretarial compliance report of Ravileela Granites Limited for the year ended 31.03.2020

We, M/s. S. S. Reddy & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by Ravileela Granites Limited ("the listed entity"),
- (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, 2020 ("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**
- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **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 and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued there under;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009: **Not Applicable**



- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.
- (k) SEBI Circular - CIR/CFD/CMD1/114/2019 (Resignation of statutory auditors from listed entities and their material subsidiaries) – *There was no change in the statutory auditors of the Company during the period under review. Further, we certify that the Company has complied with Clause 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019*

And based on the above examination, I/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 there under wherever applicable, except in respect of matters specified below:

Sr. No	Compliance requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company secretary.
1	As per reg. 6(1) of SEBI (LODR) Regulations, 2015 - a listed company shall appoint a qualified Company Secretary as Compliance Officer of the company.	Ms. Aashita Jain, Company Secretary of the company resigned on 30.05.2020.	The Company did not have a company secretary for the period commencing from 01.06.2019 to 31.03.2020.



2	As per reg. 33(3) of SEBI (LODR) – Financial Results	Non-Submission of Financial results for quarter and year ended 31.03.2020 and Audit report for financial year 2019-20	Pursuant to SEBI Circulars SEBI/HO/CFD/CMD1/CIR/P/2020/38 and SEBI/HO/CFD/CMD1/CIR/P/2020/106 the due date for submission of financial results for quarter and year ended 31.03.2020 and Audit report for financial year 2019-20 was 31.07.2020. However, the company has not held the Board Meeting for the financials pertaining to the aforementioned period and the same was informed to the exchange on 29.07.2020.
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued wherever applicable, there under in so far as it appears from my/our examination of those records.
- (c) The following are the 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	BSE	Non-Appointment of Company Secretary	As on 31 st December 2020 fine of Rs. 37,760	As on the date of this report, the payment is due.



From Hyderabad
Date: 20.07.2020

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

Sr. No (1)	Observations of the Practicing Company Secretary in previous reports (2)	Observations made in the Secretarial compliance report for the year ended 31 st March 2019 (3)	Actions taken by the listed entity, if any (4)	Comments of the Practicing Company Secretary on the actions taken by the listed entity (5)
1.	The company has made due efforts to find an appropriate incumbent and has appointed Ms. Aashita Jain as Company Secretary on 04.04.2019.	Same as in column no. 2 of this table.	Ms. Ashita Jain was appointed as Company Secretary and Compliance Officer of the Company on 05.04.2019.	Ms. Aashita Jain, Company Secretary of the company resigned on 30.05.2020 therefore the Company did not have a company secretary for the period commencing from 01.06.2019 to 31.03.2020.

For S.S. Reddy & Associates



S. Sarveswar Reddy
Proprietor

CP No: 7478, M. No. 12611

UDIN NO. A012611B000527147

Place: Hyderabad

Date: 30.07.2020