

RAJ RAYON INDUSTRIES LIMITED

(A Government Recognised Star Export House)



Date: 30/05/2022

To,

The Secretary	NATIONAL STOCK EXCHANGE OF	
BOMBAY STOCK EXCHANGE LIMITED	INDIA LIMITED	
P J Towers	Listing Department	
Dalal Street, Fort,	Exchange Plaza, 5th Floor,	
Mumbai 400 001	Bandra-kurla Complex,	
	Bandra (East),	
	Mumbai – 400 051.	
Company Code No.: 530699	Company Code : RAJRILTD	

Sub: Secretarial Compliance Report for the Financial Year ended March 31, 2022

Dear Sir and Madam,

In terms of Circular issued by the Securities and Exchange Board of India vide Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 please find enclosed herewith Secretarial Compliance Report for the Financial Year ended March 31, 2022 issued by the Secretarial Auditor of the Company Ms. Riddhi Shah, Practicing Company Secretary.

You are requested to kindly take the above information on record. Thanking you, Yours faithfully,

For RAJ RAYON INDUSTRIES LIMITED

RAJKUMAR SATYANARAYAN AGARWAL

MANAGING DIRECTOR

DIN: 00395370



A-1, KokilKunjCHSL., M. G. 'X' Road No. 4, Behind Patel Nagar, Near Vora Hospital, Kandivali (West), Mumbai - 400 067 Mob: 9819988387 Email: <u>krassociates.cs@gmail.com</u>

Secretarial Compliance Report of Raj Rayon Industries Limited

For The Financial Year Ended 31stMarch, 2022

To The Members, Raj Rayon Industries Limited

I Riddhi Shah, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Raj Rayon Industries 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 2022 ("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:-

- 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;
- 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 Audit Period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits)
 Regulations, 2014;

A-1, Kokil Kunj CHSL., M. G. 'X' Road No. 4, Behind Patel Nagar, Near Vora Hospital, Kandivali (West), Mumbai - 400 067 Mob: 9819988387 Email: <u>krassociates.cs@gmail.com</u>

- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading)
 Regulations, 2015;
- The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

and circulars/ guidelines issued thereunderand based on the above examination, 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 thereunder except:-

Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Regulation 31 Non-submission of shareholding pattern within the period prescribed	Not submitted due to non-availability of Benpos and data from the RTA and depositories.	On confirmation and receipt of benpos and data from the depository and RTA. The Company filed the report and also paid the penalty to the Stock Exchanges.

(b)The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunderinsofaras it appears from our examination of those records.

(c)The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiarieseither by SEBI or by Stock Exchanges (includingunder the Standard Operating Procedures issued by SEBI through various circulars)under the aforesaid Acts/ Regulations and circulars/ guidelines issuedthereunder.

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.
			department, ex	1.00



A-1, KokilKunjCHSL., M. G. 'X' Road No. 4, Behind Patel Nagar, Near Vora Hospital, Kandivali (West), Mumbai - 400 067 Mob: 9819988387 Email: <u>krassociates.cs@gmail.com</u>

The Company was under Insolvency Bankruptcy Code. Pursuant to NCLT			
Order dated 05th October, 2021, all the Standing Operating Procedures (SC			
for the year was waived off by the Stock Exchanges.			

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: $\frac{1}{2} \int_{\mathbb{R}^{n}} \left(\frac{1}{2} \int_{$

Sr.No	Observations of the Practicing Company Secretary in the previous reports		Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
0:	N	o reportable o	bservations	•

Allanunwal

MUMBAI COP NO. 17035 MEMBERSHIP NO A20168

Riddhi Shah

Practising Company Secretaries

COP: 17035 Place: Mumbai Date: 30/05/2022