

Date: May 30, 2022

To,
The Department of Corporate Relations
BSE Limited
P.J. Towers,
Dalal Street, Fort,
Mumbai-400 001.

Scrip Code: 507300.

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022 as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 we are enclosing herewith Annual Secretarial Compliance Report issued by Mr. S.R. Padhye, Practicing Company Secretary (FCS No. 4270, COP No. 1559) for the year ended March 31, 2022.

Kindly take the same on records.

Thanking You,
Yours Truly
For The Ravalgaon Sugar Farm Limited


Nihal Doshi
Executive Director and CFO
DIN: 00246749.



**Annual Secretarial Compliance Report of
THE RAVALGAON SUGAR FARM LIMITED
For the year ended 31st March, 2022.**

To,
The members,
THE RAVALGAON SUGAR FARM LIMITED
CIN: L01110MH1933PLC001930

I, **Company Secretary in Practice**, have examined:

all the documents and records made available to us and explanation provided by **THE RAVALGAON SUGAR FARM LIMITED** ("the listed entity"),

- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022("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 to the company during the reporting period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers)Regulations, 2011; **;(Not applicable to the company during the reporting period)**
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the company during the reporting period)**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the reporting period)**
- 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 Securities and Exchange Board of India (Registrar to an issue and share transfer agents) Regulations, 1993**(Not applicable to the company during the reporting period)**
and circulars and guidelines issued thereunder;
and based on the above examination, I hereby report that, during the Review Period:

I report further that:

- (a) The listed entity 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)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	SEBI (LODR) Reg. 33.	Non-submission of the Declaration or the statement of 'Impact of Audit Qualifications' by Statutory Auditor 2. SEBI has levied a fine of Rs 2,77,300 for the default as above	1. Company complied with this requirement on 16 th Aug 2021 by re-submission of financial results with the requisite statement. 2. The Company has made a representation on 18 th Aug 2021 and again n 23 rd August 2021 for waiver of fine of the said amount with a request -not to initiate the process of freezing the demat account of promoters 3. The revert from SEBI/Stock exchange for acceptance of both requests is awaited.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.



S.R.P.

- (c) There were no 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 thereunder in so far as it appears from my examination of those records, except for observation in (a) above.
- (d) The observations and remarks on financial statements included in the Audit Report do not warrant any comments /observations in this report, except for the below mentioned deviation as appeared in the Auditor's Report of the Company for the year under review:

Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	SEBI (LODR) Reg.33 And Section 133 Companies Act , 2013	No provision has been made for the present value of the accrued Gratuity Liability as at March 31, 2022; as required to be valued by an independent actuary amounting to Rs. 276.6 lakhs.	Departure from the Indian Accounting standards on Employee Benefits (Ind. AS19) referred to in Section 133 of the Act (refer note no. 26.1 of the Financial statements).

Note: This certificate has been issued based on the available information submitted by the company and its Directors and the registers, records, documents and papers maintained by the company.

Place: Mumbai
Date: 28.05.2022
UDIN: F004270D000418200

For S. R. Padhye & Co.



S. R. Padhye

S. R. Padhye
(Proprietor)
FCS: 4270
COP: 1559