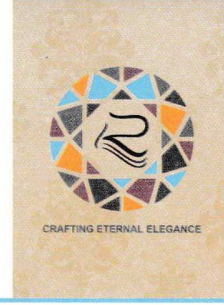


श्री १।

RADHIKA

JEWELTECH LTD
(UNIT OF RADHIKA JEWELTECH LTD)

CIN NO.: L27205GJ2016PLC093050



Date : 30.05.2024

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400 001

Co. Code : BSE - "540125"

National Stock Exchange of India Ltd.

The Manager
Listing Department,
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E)
Mumbai - 400 051

Co. Code : NSE - "RADHIKAJWE"

Dear Sir,

Subject: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015

With reference to the captioned subject, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024

Please acknowledge and take on your record.

For, RADHIKA JEWELTECH LIMITED

ASHOKKUMAR M. ZINZUWADIA

(MANAGING DIRECTOR)

(DIN : 07505964)

- Corporate office : Kalawad Road, Opp. Swaminarayan Temple, Rajkot-360001
- 0281 - 6910000 | 96245 31000 | radhikajeweltech.com
- Branch Address : Opp. Ashapura Temple, Palace Road, Rajkot-36001
- 0281 - 6910050 | 8980640000 | wecare@radhikajeweltech.com



**SECRETARIAL COMPLIANCE REPORT
RADHIKA JEWELTECH LIMITED**

For the year ended 31st March, 2024

(Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019)

To,
The Board of Directors
Radhika Jeweltech Limited
3-4-5, Raj Shrunji Complex,
Palace Road, Rajkot - 360001

I, undersigned, being proprietor of M/s. S. V. Nadiyapara & Co., Company Secretaries, have examined:

- (a) all the documents and records made available to me and explanation provided by Radhika Jeweltech 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 March 31, 2024 ("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 hereunder, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations");
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



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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 review period;**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2018 **Not Applicable to the Company during the review period;**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (repealed on 16th August, 2021) **Not Applicable to the Company during the review period;**
- g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013 (repealed on 16th August, 2021) **Not Applicable to the Company during the review period ;**
- h) Securities and Exchange Board of India (Issue and Listing of Non Convertible Securities) Regulations, 2021 (enforced on 16th August, 2021) **Not Applicable to the Company during the review period**
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 (in relation to the Companies Act and dealing with client);
- k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (repealed on 10th June, 2021) and Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (enforced on 10th June, 2021) **Not Applicable to the Company during the review period ; and**
- l) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (in relation to compliance with Rights & Obligations of Issuer under Chapter VII) ;
and circulars/ guidelines issued thereunder; and

and based on the above examination, 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 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	Detailsof Violation	Fine Amount	Observations /Remarks of the Practising Company Secretary (PCS)	Manage -ment Response	Remarks
Not applicable										

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

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Detailsof Violation	Fine Amount	Observations /Remarks of the Practising Company Secretary (PCS)	Manage -ment Response	Remarks
Not applicable										



I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The listed entity is maintaining a functional website.Timely dissemination of the documents/information under a separate section on the website.Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and	Yes	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
	specific which redirects to the relevant document(s)/section of the website.		
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	As Company has no subsidiary
6.	Preservation of Documents: The listed entity 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.	Yes	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes NA	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/ 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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	Yes	
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	NA	No such event during the review period



13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above	NA	
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Observations/Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA'

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity

Place: Rajkot
Date: 30.05.2024

For, S. V. Nadiyapara & Co.
Company Secretaries

Sandip V. Nadiyapara
Proprietor
(C.P. No. 15645)
PR No.1785/2022
UDIN : A042126F000505371