



**Radhika**<sup>®</sup>  
**JEWELTECH LIMITED**

CIN : L27205GJ2016PLC093050  
3-4-5, Rajshrunji Complex Palace Road, Rajkot - 360 001. TeleFax : 0281 - 2225066, 2233100  
Cell : 96245 31000 E-mail : radhikajeweltech@gmail.com web : www.radhikajeweltech.com

To,  
**BSE Limited**  
Phiroze Jeejeebhoy Tower,  
Dalal Street,  
Mumbai – 400 001

Date: 30.05.2022

Dear Sir,

**Subject : Annual Secretarial Compliance Report for FY 2021-22**

**Ref : Script Id : "RADHIKAJWE" and Script Code : 540125**

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 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report for FY 2021-22 issued by M/s. S. V. Nadiyapara & Co., Practising Company Secretaries for the financial year ended March 31, 2022.

This is for your information and appropriate dissemination.

Thanking you,

For, **RADHIKA JEWELTECH LIMITED**

**ASHOKKUMAR M. ZINZUWADIA**  
**(MANAGING DIRECTOR)**  
**(DIN : 07505964)**





**SECRETARIAL COMPLIANCE REPORT  
RADHIKA JEWELTECH LIMITED**

For the year ended 31st March, 2022

[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 Shrungi 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, 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 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;
- 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 10% 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 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 Deviations Observations/ (Regulations/ circulars / Remarks of the guidelines including specific Practising clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Regulation 47(1)(d) of SEBI (LODR) 2015	Delay in publishing the Postal Ballot Notice to share holder in Newspaper	The company submitted that the deviation was unintentional and would be taken care in the future

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder 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 thereunder:



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 Limited	Late submission of the Corporate governance compliance report For the quarter ended December 2021 under Regulation 27(2) of SEBI (LODR) 2015	Penalty imposed: Rs.30680/- including GST @18 % on basic fine of Rs.26000/-	Company has requested for waiver of penalty and request has been accepted.
2.	BSE Limited	Late submission of the Share holding Pattern For the quarter ended December 2021 under Regulation 31 of SEBI (LODR) 2015	Penalty Imposed: Rs.33040/- including GST @18 % on basic fine of Rs.28000/-	Company has requested for waiver of penalty and the same is still under process as no formal communication has been received from BSE limited in this regard.

d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not applicable as Company has migrated to main board of BSE with effect from 7th January, 2022.

Place: Rajkot  
Date: 29.05.2022



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

*Nadiyapara*

Sandip V. Nadiyapara  
Proprietor

(C.P. No. 15645)

PR No.1785/2022

UDIN : A042126D000422374