

IMEC/BSE/12/2019-20

May 29, 2019

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Rotunda Building, Dalal Street,
Mumbai – 400 001

Dear Sir/Madam,

Sub.: Annual Secretarial Compliance Report for the financial year ended March 31, 2019.

Reference: Scrip Code: 513295

Scrip ID: IMEC

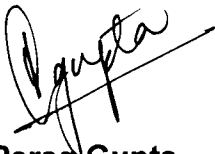
Pursuant to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find enclosed the Annual Secretarial Compliance Report, issued by Ms. Neha Jain, Practicing Company Secretary, for the financial year ended March 31, 2019.

Kindly acknowledge the receipt.

Thank you.

Yours truly,

For IMEC Services Limited
(formerly known as Ruchi Strips and Alloys Limited)



Parag Gupta
Company Secretary
M. No. A50725



Encl. as above

Neha Jain

Practicing Company Secretary

B-209, Sterling Skyline,
Mayank Blue Water Park Road, Bicholi
Hapsi Road,
Indore. (M.P.) 452016
Mobile: +91-9691399062
E mail: esnehajain11@gmail.com

**Secretarial Compliance Report of IMEC Services Limited
For the Financial Year Ended 31.03.2019**

To,
IMEC Services Limited
611, Tulsiani Chambers, Nariman Point,
Mumbai - 400021

I have examined:

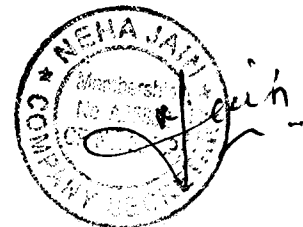
- (a) all the documents and records made available to us and explanation provided by IMEC Services Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2019 ("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:-

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

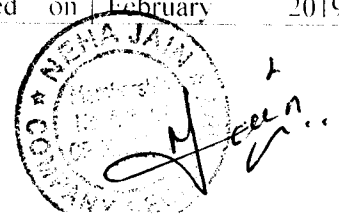


(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

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:-

S.No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	As per Regulation 7 (5) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall intimate appointment or change of new share transfer agent within seven days of entering into the tripartite agreement between existing share transfer agent, new share transfer agent and listed entity.	The listed entity appointed a new Share Transfer Agent and entered into tripartite agreement as required under Regulation 7 (5) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 but had given intimation through mail.	Listed entity intimated to stock exchange about execution of tripartite agreement under Regulation 7(5) via mail, which was not a proper means of intimation, it shall be intimated through BSE Listing Centre.
2.	As per Regulation 47 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity shall submit the newspaper publication and notice of Board Meeting to the Stock Exchange.	The listed entity has not submitted the newspaper publications of financial results and notice of the Board meetings held for the quarter ended 31 st March 2018 and 30 th June 2018 to the stock exchange.	The listed entity started submitting the newspaper publications of financial results and notice of the Board meetings to the stock exchange from subsequent quarters.
3.	As per Regulation 33(3)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty five days from the end of the each quarter.	The listed entity has submitted quarterly and year-to-date standalone financial results to the stock exchange for the quarter ended 31 st December 2018, on 19 th February 2019, which was due to be submitted on	Due to casual vacancy of Statutory auditor there was delay in submitting quarterly and year-to-date standalone financial results to the stock exchange for the quarter ended 31 st December 2018, on due date 14 th February 2019.



		14 th February 2019.	however Company have submitted it on 19 th February 2019, and paid fine of Rs 27,000 as imposed by BSE.
4.	The Listed entity shall intimate Securities and Exchange Board of India of India after change of its name and update new name of listed entity on SCORE website.	Listed entity has not intimated to Securities and Exchange Board of India as on 31 st March 2019.	Listed entity has intimated to Securities and Exchange Board of India about change of name and updated its new name on SCORE website after 31 st March 2019.

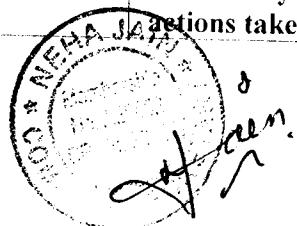
(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.

(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:

S.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	Regulation 33(3)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Fine imposed by BSE through letter dated 05.03.2019, for late submission of financial results for the quarter ended December 2018 of Rs. 5000 per day till the date of compliance i.e. Rs. 25000 + 4500(18% GST) 29500 -	Listed entity have paid Rs. 27000/- (net of TDS of Rs. 2500) on 12.03.2019 through NEFT.

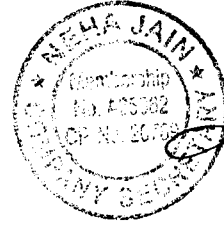
(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not applicable for the financial year 2018-19.

S.No.	Observations of the Practicing Company	Observations made in the secretarial compliance	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the
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	Secretary in the previous reports	report for the year ended... (The years are to be mentioned)		listed entity

Place: Indore
Date : 25.05.2019



Neha Jain

Signature:
Neha Jain

Practicing Company Secretary
ACS/ FCS No.: A25862
C P No.: 20769