



## RAJESH EXPORTS LIMITED

Mfrs & Exporters of Gold and Diamond Jewellery  
# 4, BATAVIA CHAMBERS, KUMARAKRUPA ROAD  
KUMARA PARK EAST, BENGALURU - 1 INDIA  
PH : 22266735, 22260443, 22282215, 41623638, 41529154  
FAX : +91-80-2225 9503 Email : corpcomm@rajeshindia.com  
CIN No. : L36911KA1995PLC017077  
Website : www.rajeshindia.com

May 27, 2022

To,  
The Manager Listing  
Bombay Stock Exchange Limited  
Mumbai  
Scrip Code: 531500

To,  
The Manager Listing  
National Stock Exchange of India Limited  
Mumbai  
Scrip Code: RAJESHEXPO

Dear Sirs,

**Sub: Secretarial Compliance Report** under Regulations 24A of the SEBI (Listing Obligations and Disclosure Requirements) Reg. 2015 for the year ended March 2022

With reference to the above subject, please find enclosed Annual Secretarial Compliance Report for the year ended March 31, 2022 for your record, as per Regulations 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Thanking You

For Rajesh Exports Limited

Rajesh Mehta  
Chairman





COMPANY SECRETARY  
CP No: **14992**, ACS No: **39541**

No.450, 9<sup>th</sup> cross, JP Nagar,  
2<sup>nd</sup> phase, Bangalore – 560078

MOBILE: **9115731257 / 9886096664**

E-mail: [deepakksadhu@gmail.com](mailto:deepakksadhu@gmail.com)

**SECRETARIAL COMPLIANCE REPORT OF M/s. RAJESH EXPORTS LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2022**

We, Deepak Sadhu & Co, Company Secretaries have examined:

- (a) All the documents and records made available to us, either physically or by way of email in view of the prevailing pandemic situation of COVID -19 and explanation provided by M/s. **RAJESH EXPORTS 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 financial 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 there-under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“**SCRA**”), rules made there-under and the Regulations, circulars, guidelines issued there-under by the Securities and Exchange Board of India (“**SEBI**”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there-under, 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: **Not applicable for the current reporting period**
- (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 for the current reporting period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: **Not applicable for the current reporting period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: **Not applicable for the current reporting period**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: **Not applicable for the current reporting period**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And 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 there-under, except in respect of matters specified below:



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SN	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	Late submission of Secretarial Compliance Report for the Financial year ended 31 <sup>st</sup> March, 2021.	Secretarial Compliance Report was filed on July 02, 2021 and the extended due date was June 30, 2021.
2	Regulation 44 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	Late submission of e-voting results of the Annual General Meeting held on 25 <sup>th</sup> December, 2021.	E-voting results of the Annual General Meeting was filed on 30 <sup>th</sup> December, 2021 and due date was 28 <sup>th</sup> December, 2021.
3	Regulation 33 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	Late submission of Cash Flow Statements for the half year ended 31 <sup>st</sup> March, 2021 and 30 <sup>th</sup> September, 2021.	Cash Flow Statements for the half year ended 31 <sup>st</sup> March, 2021 and 30 <sup>th</sup> September, 2021 were filed on 26 <sup>th</sup> August, 2021 and due date was 30 <sup>th</sup> June, 2021 and 15 <sup>th</sup> November, 2021 respectively.

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

S N	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	NSE	Regulation 33	Rs. 235,000 fine levied by NSE vide letter dated August 16, 2021 (Reference# NSE/SOP/RBF/0145)	The Company has requested for waiver of the penalty levied by the exchange.
2	NSE	Regulation 29(2)/(3)	Rs. 10,000 fine levied by NSE vide letter dated September 16, 2021 (Reference# NSE/SOP/RBF/0148)	The Company has requested for waiver of the penalty levied by the exchange.
3	NSE	Regulation 33	Rs. 145,000 fine levied by NSE vide letter dated December 14, 2021 (Reference# NSE/LIST-SOP/COMB/FINES/0821)	The Company has requested for waiver of the penalty levied by the exchange.
4	NSE	Regulation 17(1), 18(1), 19(1)/19(2)	Rs. 22,90,000 fine levied under Reg. 17(1), Rs. 916,000 fine levied under Reg. 18(1) and Rs. 186,000 fine levied under Reg. 19(1)/19(2) vide letter dated November 22, 2021 (Reference# NSE/LIST-SOP/COMB/FINES/0825)	The Company has requested for waiver of the penalty levied by the exchange.
5	NSE	Regulation 17(1), 18(1), 19(1)/19(2)	Rs. 425,000 fine levied under Reg. 17(1), Rs. 170,000 fine levied under Reg. 18(1) and Rs. 170,000 fine levied under Reg. 19(1)/19(2) vide letter dated February 21, 2022 (Reference# NSE/LIST-SOP/COMB/FINES/0832)	The Company has requested for waiver of the penalty levied by the exchange.
6	NSE	Regulation 20, 21	Rs. 718,000 fine levied under Reg. 20 and Rs. 284,000 fine levied under Reg. 21 vide	The Company has requested for waiver of the penalty levied by the



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			letter dated March 25, 2022 (Reference# NSE/LIST-SOP/COMB/FINES/0833)	exchange.
7	NSE	Regulation 24(A)	Rs. 4,000 fine levied by NSE vide letter dated March 11, 2022 (Reference# NSE/LIST/SOP/ RAJESHEXPO)	The Company has requested for waiver of the penalty. The exchange has been rejected the waiver.
8	BSE	Regulation 17(1), 18(1), 19(1)/19(2)	Rs. 425,000 fine levied under Reg. 17(1), Rs. 170,000 fine levied under Reg. 18(1) and Rs. 170,000 fine levied under Reg. 19(1)/19(2) vide email letter dated February 21, 2022	The Company has requested for waiver of the penalty levied by the exchange.

The listed entity has taken the following actions to comply with the observations made in previous reports:

SN	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 29(1) -Intimation given to exchange prior to 5 days of the board meeting held on 14" Nov 2020 instead of 7 days (5+2)}.	31 <sup>st</sup> March, 2021	The Company has requested for waiver of the penalty levied by the exchange.	Rs. 11,800/- fine levied by NSE vide letter dated Dec 21, 2020 (Reference# NSE/LIST-SOP/REG-31/FINES0813)
2	Regulation 31(1)(b) - Shareholding pattern submitted to Exchange in 24 days instead of 21 days from close of quarter June 2020.	31 <sup>st</sup> March, 2021	The Company has abide by the directions of the exchange and cleared the fine of Rs. 7,080/- levied.	Rs. 7,080/- fine levied by NSE (Reference# NSE/LIST-SOP/REG-31/FINES101248)

For **DEEPAK SADHU & CO,**  
**COMPANY SECRETARIES**



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**DEEPAK SADHU**

Practicing Company Secretary

ACS: 39541; CP No: 14992

Thanking You,

Place : **Bangalore**

Date : **27<sup>th</sup> May 2022**

UDIN: **A039541D000409636**