

Date: 30-June-2021

To,  
The Department of Corporate Relations  
BSE Limited  
P.J. Towers,  
Dalal Street, Fort,  
Mumbai-400 001.  
Scrip Code: 507300.

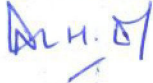
**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020 as per Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

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, 2021.

Kindly take the same on records.

Thanking You,  
Yours Truly  
For The Ravalgaon Sugar Farm Limited



**Nihal Doshi**  
Executive Director and CFO  
DIN: 00246749.

**Secretarial compliance report of  
THE RAVALGAON SUGAR FARM LIMITED**

**For the year ended 31<sup>st</sup> March, 2021.**

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"),

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

for the year ended 31<sup>st</sup> March, 2021("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:-

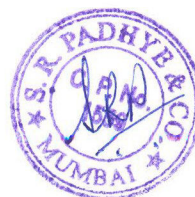
- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;**(Not applicable to the company during the reporting period)**
- c) Securities 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 to the company during the reporting period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the reporting period)**
- f) 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:
- (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.      | Transfer of equity shares to IEPF Authority under section 124(7) of the Companies Act, 2013 | Show cause notice dated 29.11.2019 received for non transfer of equity shares to IEPF Authority. | The Company has requested vide its letters dated 3rd January, 2020 and 14th February, 2020 for extension of time to comply with the provisions of the said section and rules of IEPF Authority. The company in consultation with its RTA M/s Freedom Registry Ltd. has taken steps to identify the shareholders whose shares need to be transferred to IEPF Authority. The company has put up a notice on its website requesting the shareholders to respond in connection with transfer of their shares to IEPF Authority in order to comply with the provisions of section 124(6) of the Companies Act,2013. |



- (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.
- (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.
- (d) 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 |
|--------|-----------------|----------------------|---|--|
| Nil    | Nil             | Nil                  | Nil   | Nil  |

**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.

For S. R. Padhye & Co.

Place: Mumbai  
Date: 30.06.2021  
UDIN: F004270C000547604



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