



RAW EDGE INDUSTRIAL SOLUTIONS LIMITED

AN ISO 9001:2015 & 14001:2015 CERTIFIED COMPANY

REGD. OFFICE:

OFFICE NO.: A-9, B-1/04-05, GF, B WING,
BOOMERANG, CHANDIVALI FARM ROAD,
ANDHERI (E), MUMBAI - 400072.
M : +91 7226996805

CORPORATE OFFICE:

02, NAVKRUTI APPT., B/H. B.R. DESIGNS,
NR. LAL BUNGLOW, ATHWALINES,
SURAT - 395007.
M : +91 9724326805

June 30, 2020

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai- 400001

Sub : Annual Secretarial Compliance Report for the Financial Year ended March 31, 2020

Ref. : SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019

Script Code: 541634

Dear Sir/Madam,

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find attached the Annual Secretarial Compliance Report of Raw Edge Industrial Solutions Limited ("the Company") for the Financial Year ended March 31, 2020, issued by Mr. Ranjit Binod Kejriwal, Practicing Company Secretary, Secretarial Auditor of the Company.

Request you to please take the same on your records.

Thanking you

Yours Faithfully,
For Raw Edge Industrial Solutions Limited

Shuanakbhai Soni
Company Secretary and Compliance Officer
Place: Surat



Encl: As above

Your leading edge in raw materials



RANJIT KEJRIWAL
Company Secretaries

1, Aastha, 2/906, Hira Modi Sheri, Opp. Gujarat Samachar Press, Ring Road, SURAT-395 002.
Tel.: 0261 - 2331123, 2355984 E-mail : rbksurat@gmail.com

Date :

Secretarial compliance report of
M/s Raw Edge Industrial Solutions Limited
For the year ended 31.03.2020

To,
The Board of Directors
Raw Edge Industrial Solutions Limited
CIN: L14219MH2005PLC240892
Office No. A-9, B-1/04-05, Ground Floor,
B Wing, Boomerang, Chandivali Farm Road,
Andheri East, Mumbai City-400072

Auditor's Responsibility:

Our responsibility is to express an opinion on compliance of these acts, rules, regulations and circulars and maintenance of records based on our audit. We conducted our audit in accordance with the Auditing Standards issued by the Institute of Company Secretaries of India. Those Standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about compliance of acts, rules, regulations and circulars and maintenance of records.

We further state that due to the inherent limitations of an audit including internal, financial and operating controls, there is an unavoidable risk that some material misstatements or material non-compliances may not be detected, even though the audit is properly planned and performed in accordance with standards.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

I have examined the records of M/s Raw Edge Industrial Solutions Limited ("the Company") which comprises:

- All the documents and records made available to us and explanation provided by the Company
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/filing, as maybe relevant, which has been relied upon to make this certification.

For the financial year ended **31.03.2020** ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, Guidelines issued thereunder; and
- 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:-

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital And Disclosure Requirements) Regulations, 2018; **the regulation is not applicable during the Financial Year 2019-2020**
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **the regulation is not applicable during the Financial Year 2019-2020**
- SEBI (Share Based Employee Benefits) Regulations, 2014; **the regulation is not applicable during the Financial Year 2019-2020**



- (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008; **the regulation is not applicable during the Financial Year 2019-2020**
- (g) SEBI (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; **the regulation is not applicable during the Financial Year 2019-2020**
- (h) SEBI (Prohibition of Insider Trading) Regulations, 2015 and circulars/guidelines issued thereunder;

And based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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	Regulation 27(2) of SEBI (LODR) 2015	The Company misreported in CG report that it does not falls under top 2000 Company for quarter ended 30.06.2019	The Company filed a revised CG report after correcting the mistake on 12.07.2019
2	Regulation 23 of SEBI (LODR) 2015	The values of Related Party Transaction for 30.09.2019 were wrongly taken for 31.03.2019	The Company filed a revised detail with corrected figures of 30.09.2019 on 15.11.2019
3	Regulation 32 of SEBI (LODR) 2015	Statement of Deviation and/or Variation in utilization of public issue proceeds for 30.09.2019 has filed beyond time limit	The Company filed Statement of Deviation and/or Variation in utilization of public issue proceeds for 30.09.2019 on next day of time limit ie.15.11.2019
4	Regulation 44(3) of SEBI (LODR) 2015	Voting result of Annual General Meeting held on 23.09.2019 has filed beyond time limit	Voting result of Annual General Meeting held on 23.09.2019 has filed after 48 hours of Conclusion of meeting after a delay of 4 hours.
5	Regulation 34 of SEBI (LODR) 2015	There was a mistake in current tax in financial statement published in Annual report of 2018-19, which effected the profit figures published.	The company have filed financial statement with corrected figures of tax at BSE-XBRL filling, Financial result with Audit report and AOC-4 XBRL.
6	Regulation 46 of SEBI (LODR) 2015	The Company has not updated the policy of "Anti Sexual Harassment Policy" on website	Policy of "Anti Sexual Harassment Policy" not updated at website of the Company

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circular/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 promoter/ directors/material subsidiaries either by SEBI or by stock exchange (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 E.g. fines, warning letter, debarment, etc.	Observations/Remarks of the Practicing Company Secretary, if any.
NIL	NIL	NIL	NIL	NIL

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Updated result in required format was filed on 17.11.2018. And the deviation was complied.	31st March, 2019	Company has filed Half yearly financial result in required format	Complied

Place: Surat
Date: 30.06.2020



Signature: *Ranjit Kejriwal*
Name of PCS: Ranjit Binod Kejriwal
FCS No.: 6116
C P No.: 5985
UDIN: F006116B000401896