



## **RAGHUVIR SYNTHETICS LIMITED**

REGD. OFF.: RAKHIAL ROAD, RAKHIAL, AHMEDABAD-380 023. INDIA

PHONE: 079-22911015 - 22911902 - 22910963

Email: [info@raghuvir.com](mailto:info@raghuvir.com)

Website: <http://www.raghuvir.com>

CIN: L17119GJ1982PLC005424

Date: 29.05.2024

To  
The Manager  
Department of Corporate Services  
BSE Ltd.  
Dalal Street, Fort  
Mumbai - 400 001

**Sub. - : Submission of Annual Secretarial Compliance Report under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 for the year ended 31st March, 2024**

**Ref. - : Scrip Code - 514316**

Sir / Madam,

Please find enclosed herewith the, Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2024 received from **M/s. SPAN & Co. Company Secretaries LLP**, Practicing Company Secretary, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019.

Kindly take the same on your records and acknowledge the receipt.

Thanking you,

Yours faithfully,

**For RAGHUVIR SYNTHETICS LIMITED**

**Aditi**

**Khandelwal**

Digitally signed by

Aditi Khandelwal

Date: 2024.05.29

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**Aditi Khandelwal**  
**Compliance officer**

Encl: as above



**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
“RAGHUVIR SYNTHETICS LIMITED”**

**for the financial year ended 31<sup>st</sup> March, 2024**

*[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

To,  
The Board of Directors  
**RAGHUVIR SYNTHETICS LIMITED**  
(CIN: L17119GJ1982PLC005424)  
Rakhial Road, Rakhial, Ahmedabad- 380023, Gujarat, India

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **RAGHUVIR SYNTHETICS LIMITED** (hereinafter referred as ‘**the listed entity**’), having its Registered Office at Rakhial Road, Rakhial, Ahmedabad-380023, Gujarat, India Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity’s books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024 (“**Review Period**”), complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, **SPAN& Co. Company Secretaries LLP**, have examined:

- a) all the documents and records made available to us and explanation provided by **Raghuvir Synthetics Limited**, having **CIN: L17119GJ1982PLC005424** and its Registered Office situated at Rakhial Road, Rakhial, Ahmedabad- 380023, Gujarat, India (“**the listed entity**”),

**Regd. Office:** No. 157/60, Rangarajapuram Main Road, Kodambakkam, Chennai – 600 024

**Branch Office:** 606, 6th Floor, Shivalik Square Nr. Adani CNG Pump, 132 Ft. Ring Road, New Vadaj, Ahmedabad-380013, Gujarat, India

**Mob.:** +91 89800 26497

**Email:** info@spanllp.com

www.spanllp.com

- 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 Report.

for the 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”) and the 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 [**“SEBI (LODR) Regulations, 2015”**];
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; ***-Not applicable during the review period***
- c) The 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 during the review period***
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; ***-Not applicable during the review period***
- f) The Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; ***-Not applicable during the review period***
- g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the above 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)	Regulation/ Circular No.	Deviation <sup>s</sup>	Action Taken by	Type of Action	Details Of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 30 of SEBI (LODR) Regulations, 2015			BSE Limited through its website dated 18 <sup>th</sup> May, 2023	Clarification sought on significant movement in price			The requisite clarification was given by the Listed Entity to BSE Limited on May 23rd, 2023.		

- b) The listed entity has taken the following actions to comply with the observations made in the previous report (for the FY 2022-23):

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation <sup>s</sup>	Action Taken by	Type of Action	Details Of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
NIL										

- I. We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1	<p><b><u>Secretarial Standards:</u></b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>	Yes	-
2	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	-
3	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website.</li> </ul>	Yes	-
4	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	-
5	<p><b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b></p> <ul style="list-style-type: none"> <li>• Identification of material subsidiary companies</li> </ul>	Yes	-

	<ul style="list-style-type: none"> <li>• Disclosure requirement of material as well as other subsidiaries</li> </ul>		
6	<p><b><u>Preservation of Documents:</u></b></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	-
7	<p><b><u>Performance Evaluation:</u></b></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	-
8	<p><b><u>Related Party Transactions:</u></b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes	-
9	<p><b><u>Disclosure of events or information:</u></b></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	-
10	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	-
11	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either</p>	Yes	-

	<p>by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>		
12	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	Not Applicable	-
13	<p><b><u>Additional Non-compliances, if any:</u></b></p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	Yes	-

**Date:** 29/05/2024

**Place:** Ahmedabad

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**Premnarayan Ramanand Tripathi**  
**(Designated Partner)**  
**SPAN & Co. Company Secretaries LLP**  
**FCS: 8851**  
**COP: 10029**  
**PR: 800/2020**  
**UDIN: F008851F000485998**

***Note:** This report is to be read with our letter of even date which is annexed as “Annexure A” and forms an integral part of this report.*

## Annexure-A

Our report of even date is to be read along with this letter:

1. Maintenance of records with respect to compliance of applicable laws as referred in this Annual Secretarial Audit Report (“ASCR”) is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
2. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
3. Where ever required, we have obtained the Management representation about the compliance of applicable laws as referred in this ASCR and happening of events etc.
4. ASCR is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity. Our examination was limited to the verification of procedures on test basis.

**Date:** 29/05/2024  
**Place:** Ahmedabad

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**Premnarayan Ramanand Tripathi**  
**(Designated Partner)**  
**SPAN & Co. Company Secretaries LLP**  
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