

CIN: L23200MH1985PLC035187

REGD. OFFICE:

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TALUKA KHALAPUR, E-MAIL: rama@ramagroup.co.in
DISTRICT RAIGAD - 410 220. MAHARASHTRA WEB : www.ramapetrochemicals.com

REF: RPCL/BMD/2020 Date: June 25, 2020

To,

Bombay Stock Exchange Limited,
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

BSE Scrip Code

500358

Name of the Company

RAMA PETROCHEMICALS LIMITED

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

Dear Sir,

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s. Jignesh M Pandya & Co., Company Secretaries in Practice, for the financial year ended March 31, 2020

We request you to kindly take note of the same.

Thanking you,

Yours faithfully,

For RAMA PETROCHEMICALS LIMITED

R D JOG

COMPANY SECRETARY



JIGNESH M. PANDYA & CO.

Company Secretaries

205, Shashi CHS. Ltd., Behind Raghunath Tower, Devidas Road, Borivali (W) Mumbai 400 103. Tel.: +91 22 28084509 ● Mob.: +91 9819065068 ● E-mail: jigneshpandyacs@gmail.com

Secretarial Compliance Report of Rama Petrochemicals Limited for the year ended 31^{st} March, 2020

- I , Jignesh Pandya have examined:
 - (a) all the documents and records made available to me/us and explanation provided by Rama Petrochemicals Limited (" the listed entity")
 - (b) the filing/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 $31^{\rm st}$ March, 2020 ("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;

The constitution of Board is not as per Regulation 17(1) (b) of LODR Regulations, 2015.

We have been informed that the Company is in process of appointing Independent Director.





JIGNESH M. PANDYA & CO.

Company Secretaries

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- (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; Not Applicable.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable.**
- (g) Securities and Exchange Board of India (Issue and Listing Obligations of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

 Applicable.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/guidelines issued there under:

and based on the above examination, I/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:

Sr.	Compliance Requirement	Deviations	Observations/Remarks	
No.	(Regulations/circulars/ guidelines including specific clause)		of the Practicing Company Secretary	
	N. A.	N.A.	N.A.	





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- (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 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 there under:

Sr.	Action take	en by	Details	of	Details of Observations/remark		ns/remarks	
No.			violation		action	taken	of the	Practicing
					e.g.	fines,	Company	Secretary,
					warning		if any	
					letter,			
					debarn	nent,		
					etc.	*45		
	N. A.		N.A.		N.A.		N. A.	

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

Sr.	Observations of	Observations made in	Actions	Comments of	
No.	the Practicing	the secretarial	taken by the	the Practicing	
	Company	compliance report for	listed entity,	Company	
	Secretary in	the year ended	if any	Secretary on	
	the previous	(The	2	the actions	
	reports	years are to be		taken by the	
		mention in the		listed entity	
		subsequent years)			
	N.A.	N.A.	N.A.	N.A.	

Place: Mumbai

Date: 17th June, 2020

UDIN: A007436B000349325

ACS - 7346 CO - 7318 CO -

JIGNESH M. PANDYA & CO.

(Proprietor) ACS 7346 CP 7318