



CIN:L14102TG1990PLC011909

Date: 1<sup>st</sup> June 2021

To  
BSE Limited  
1<sup>st</sup> Floor, Rotunda Building  
P. J. Towers, Dalal Street  
Mumbai – 400 001

Dear Sir/Ma'am,

**Sub:** Submission of Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.

**Ref:** Scrip Code – 526095

With reference to the above cited subject above, we are enclosing herewith the Secretarial Compliance Report Secretarial Compliance Report for the year ended 31st March 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.

Kindly accept the same and acknowledge the receipt.

Yours faithfully,

**For RAVILEELA GRANITES LIMITED**

**Parvatha Samantha Reddy**  
**Whole-time Director**  
**DIN: 00141961**

H.No. 6-3-668/10/35  
Durganagar Colony  
Punjagutta, Hyderabad - 500 082.

*Ravi Beela*  
**GRANITES LTD**

CIN#L14102AP1990PLC011909  
Tel : 23413733, Fax : 23413732  
E-mail : ravileel@yahoo.com

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Regd. Office : SAMPANNABOLU (V), SHAMEERPET (M), MEDCHAL DIST.  
FACTORY ADD: PLOT NO. 15 APIC BPSEZ ANNANGI VILLAGE MADDIPADU MANDAL PRAKASAM DIST



**Atluri Ramesh** FCS  
M.Com., B.L., P.G.D.P.M., I & C

**PRACTISING COMPANY SECRETARY**  
**REGISTERED VALUER : S & F A**

**SECRETARIAL COMPLIANCE REPORT OF RAVILEELA GRANITES LIMITED**  
**CIN L14102TG1990PLC011909**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2021**

**We, Atluri Ramesh & Associates, Company Secretaries, have examined:**

- (a) All the documents and records made available to us and explanation provided by Ravileela Granites Limited ("**the listed entity**");
- (b) The filings/ submissions made by the listed entity to the stock exchange;
- (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<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 for 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 for the reporting period**).
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not applicable for the reporting period**).

*Handwritten signature in green ink.*



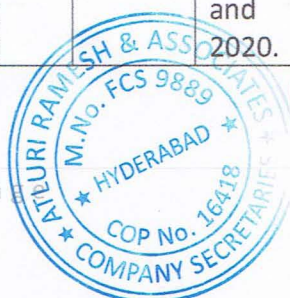


- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable for the reporting period).**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable for the reporting period).**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And relevant circulars/ guidelines issued thereunder, to the extent applicable;

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 thereunder except to the fact that ***the penalty has been levied on the Company for Non appointment of the Whole-time Company Secretary and Compliance Officer as briefed in Clause C herein below.***
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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 issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. Fines, warning letters, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	BSE Limited	Non appointment of Whole-time Company Secretary and Compliance Officer under Regulation 6(1) of SEBI (LODR), 2015 for the Quarter ended June 2020 and September 2020.	Penalty have been levied for the Quarter ended June 2020 (Rs. 1,07,380/-) and September 2020 (Rs. 1,08,560/-) and the same has been paid by the Company. Later penalty levied for the Quarter June 2020 was waived off due to outbreak of Covid 19.	The Company has appointed Ms. Kishwar Fatima as the Company Secretary cum Compliance Officer w.e.f. 15 <sup>th</sup> September 2020. As on 31 <sup>st</sup> March 2021, all the compliances under SEBI regulations are in place and there is no violation of any SEBI regulation.



- (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 report	Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non appointment of Whole-time Company Secretary and Compliance Officer under Regulation 6(1) of SEBI (LODR), 2015	The Company did not have a Company Secretary for the period commencing from 01.06.2019 to 31.03.2020.	The Company has made due efforts to find an appropriate candidate for the role of Whole-time Company Secretary and Compliance Officer.	Due to outbreak of Covid, the Company could not appoint an appropriate candidate anytime soon but nonetheless it appointed Ms. Kishwar Fatima as the Company Secretary cum Compliance Officer w.e.f. 15 <sup>th</sup> September 2020
2.	Non-Submission of Financial results for quarter and year ended 31.03.2020 and Audit report for financial year 2019-20	Pursuant to SEBI Circulars SEBI/HO/CFD/CMD1/CI R/P/2020/38 and SEBI/HO/CFD/CMD1/CI R/P/2020/106 the due date for submission of financial results for quarter and year ended 31.03.2020 and Audit report for financial year 2019-20 was 31.07.2020. However, the Company has not held the Board Meeting for the financials	The Company informed to the exchange on the matter on 29.07.2020.	-

*Ravi Kumar*



		pertaining to the aforementioned period and the same was informed to the exchange on 29.07.2020.		
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For and on behalf of  
**ATLURI RAMESH & ASSOCIATES**  
Company Secretaries

Place: Hyderabad  
Date: 31<sup>st</sup> May 2021  
UDIN F009889C000400180

Ramesh Atluri  
Practicing Company Secretary  
M .No. FCS 9889; CP No. 16148

