Rapicut Carbides Limited

Regd. Office & Works:

119, GIDC Industrial Area,

Ankleshwar - 393 002, Gujarat (India) Tel.: ++91 (2646) 251118, 221071

e-mail: info@rapicutcarbides.com Web site: www.rapicutcarbides.com





An ISO 9001 CERTIFIED COMPANY

CIN: L28910GJ1977PLC002998

PAN No. AAACR8753N

The Manager Corporate Relationship Dept. BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai - 400 001.

REF: RCL:KMS:BSE-SEC-COMP/20:

Date: 23rd July, 2020

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2020.

Scrip Code: 500360.

Dear Sir,

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 8th February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s Samdani Shah & Kabra, Practicing Company Secretaries for the financial year ended 31st March, 2020.

Kindly take note of the same.

Thanking you,

Yours faithfully,

For Rapicut Carbides Limited

Kamlesh M Shinde Company Secretary



Secretarial Compliance Report

of Rapicut Carbides Limited for the Financial Year ended March 31, 2020 [Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

We have examined:

- a. all the documents and records made available to us and explanation provided by Rapicut Carbides Limited having CIN: L28910GJ1977PLC002998 ("the Listed Entity"),
- 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 certification,

for the year ended March 31, 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;
- b. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Depositories and Participants)
 Regulations, 2018;
- d. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e. Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulation, 1993;

and the Listed Entity has complied with Clauses 6(A) and 6(B) mentioned in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, as well as various other circulars / guidelines issued thereunder;

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There were no action / events in pursuance of the following regulations requiring compliance thereof by the Listed Entity during the review period:-

- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities)
 Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- d. Securities and Exchange Board of India (Share Based Employee Benefits)
 Regulations, 2014;
- e. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

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 in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / Circulars / Guidelines / including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary			
Nil						

- 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.	Action	Details of	Details of action	Observations of the
No.	taken by	violation	taken E.g. Fines,	Practicing Company
			Warning Letter,	Secretary, if any.
			Debarment etc	

Nil

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d. The Listed Entity has taken the following actions to comply with the observations made in previous reports:

Sr.	Observations	Observations	Actions	Comments of the		
No.	of the	made in the	taken by	Practicing Company		
	Practicing	Secretarial	the Listed	Secretary on the		
	Company	Compliance	Entity, if	actions taken by the		
	Secretary in	Report for the	any	Listed Entity.		
	previous	year ended				
	reports	March 31, 2019				
Not Applicable						

S. Samoan Partner

Samdani Shah & Kabra

Company Secretaries

FCS No.: 3677 CP No.: 2863

UDIN: F003677B000494794

Place: Vadodara Date: July 23, 2020