

ROLLATAINERS LIMITED

Registered Office: Plot No. 73-74, Phase-III, Industrial Area, Dharuhera, District Rewari, Haryana-123106
Tel.: 01274-243326, 242220 E-mail: www.rollatainers.in
CIN: L21014HR1968PLC004844

Date: June 30, 2021

Ref.No.: RTL/BSE/NSE/2021-22

To

The Secretary BSE Limited Phiroze Jeejeebhoy, Towers Limited Dalal Street, Mumbai - 4000 01	Bandra (E) Mumbai - 400 051
Scrip Code: 502448	Symbol: ROLLT

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, 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 Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2021.

This is for your information and records.

Thanking You, Yours faithfully,

For Rollatainers Limited

Aditi Jain

(Company Secretary)

Enclosed: As stated

S. Khurana & Associates

Company Secretaries

Secretarial Compliance Report of ROLLATAINERS LIMITED

for the financial year ended March 31, 2021

Company Name

: Rollatainers Limited

CIN

: L21014HR1968PLC004844

Registered Office Address: Plot No. 73-74, Phase-III, Industrial Area, Dharuhera, District-

Rewari, Haryana 123106

Listed on

: Bombay Stock Exchange Limited ("BSE")

National Stock Exchange ("NSE")

- I, Sachin Khurana, Practicing Company Secretary have examined:
 - a) All the documents and records made available to us and explanation provided by ROLLATAINERS LIMITED ("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, 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 there under; and
- b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI"):

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;
- 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 as the Company has not bought back any of its securities during the financial year under review.

e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable as the Company has not granted any options to its employees during the financial year under review

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 of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there under, except in respect of matters specified below: -

Sr. No	Compliance Requirement (Regulations/Circulars/guideline including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1,	Regulation 6(1) – Company to appoint a qualified Company Secretary within 6 months from vacation of office	Company Secretary was appointed after 6 months from previous resignation	Fine was levied by BSE and NSE for Quarter ended December 31, 2020 of Rs. 1,08,560/each which was paid or April 8, 2021.
2.	Regulation 33 – Financial Results for quarter ended December 31, 2020	Financial results' were submitted beyond a period of 45 days	Fine was levied by BSE and NSE for Quarter ended December 31, 2020 of Rs. 17,700/-each which was paid on April 8, 2021
3.	Regulation 23(9) – Disclosure of Related Party Transactions for quarter ended September 30, 2020	Non-compliance with disclosure of related party transaction on consolidate basis	Fine was levied by NSE of Rs. 1,65,200/- which is pending for payment
4.	Annual Listing Fee for Financial Year 2020-21	Pending for payment	The Annual Listing Fee for NSE of Rs. 3,42,200/- is pending for payment
5	Regulation 34 — Annual Report submission to Stock Exchange for FY ended March 31, 2020	Annual Report was not submitted to stock exchange with the prescribed time	Fine of Rs. 68,440/- was levied by BSE which is pending for payment
6	Regulation 33 – Financial Results for quarter ended September 30, 2020	Delayed in submission	Fine was levied by BSE and NSE for Quarter ended September 30, 2020 of Rs. 35,400/each which is pending for payment.
7	Regulation 33 – Financial Results for quarter ended March 31, 2020	Delayed in submission	Fine was levied by BSE and NSE for Quarter ended March 31, 2020 of Rs. 70,800/- each which is pending for payment.

8	Regulation 27 – Corporate Governance Report for the quarter ended March 31, 2020	Delayed in submission	Fine of Rs. 40,120/- was levied by BSE which is pending for payment	
9	Regulation 31 – Sharcholding pattern for the quarter ended March 31, 2020	Delay in submission	Fine of Rs. 40,120/- was levied by BSE which is pending for payment	

- (b) The listed entity has generally maintained records under the provisions of the above Regulations and circulars / guidelines issued there under in so far 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. No	Action Taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc.	remarks of the Practicing Company
1.	Stock Exchange	Non compliance pertaining to Regulation 6(1), 23(9), 30 33, 34, 76, of SEBI (LODR) Regulations, 2015	The Stock Exchanges levied monetary fine(s) for Non-compliance with SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015.	information/documents provided by the management, few penalties are paid and few are pending for
2.	Stock Exchange	Discrepancies in the Corporate Announcement	Discrepancy notice has been received by the company to rectify the Corporate Announcement made for the appointment of Company Secretary and Compliance officer	As per the information/documents provided by the management the Corporate Announcement was rectified
3.	CDSL	Payment to CDSL of Rs. 11800/- was not made within time for monitoring the Foreign Investment Limits	CDSL blocked BENPOS	As per the information received, company has paid the penalty



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

	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance report for the Year ender March 31, 2020	Actions taken by the listed entity, if any t	
	Delay in submission of investor complaint for quarter ended March 31, 2019 pursuant to Regulation 13 of SEBI (LODR) Regulations, 2015	Delay of 61 days	Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
2.	Delay in submission of shareholding pattern for the quarter ended March 31, 2019	Delay of 20 days	Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
3.	Delay in submission of share capital audit report for the quarter ended March 31, 2019	Delay of 21 days	Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
4,	Delay in submission of Compliance Certification under Regulation 7(3) Regulation 13 of SEBI (LODR) Regulations, 2015 for half year ended March 31, 2019		Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
5.	Delay in submission of Half Yearly certificate from a practicing Company Secretary under Regulation 40(9) for half year ended March 31, 2019		Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
6.	Delay in submission of shareholding pattern for the quarter ended June 30, 2019		Fine was duly paid by the company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
7.	Delay in submission of disclosure for Related Party Transactions for the half year ended September 30, 2019	19	Fine was duly paid by he company.	As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange

8.	Delay in submission of Annual Report for the FY 2018-19		As per the information / documents provided the listed entity has paid the fine levied by Stock Exchange
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Due to restricted movement amid COVID-19 pandemic, we have conducted online verification & examination of records and other documents of the Company, as facilitated by the Company, for the purpose of issuing this Report.

For S. Khurana & Associates

Company Secretaries FRN: 12014DE1158200 Peer Review No. 804/2020

Sachin Khurana

Proprietor

M. No.: F10098; CP No.:13212 UDIN - F010098C000553685

Date: 30/06/2021 Place: New Delhi