

RAJESH EXPORTS LIMITED Mfrs & Exporters of Gold and Diamond Jewellery # 4, BATAVIA CHAMBERS, KUMARAKRUPA ROAD KUMARA PARK EAST, BENGALURU - 1 INDIA PH: 22266735, 22260443, 22282215, 41623638, 41529154 FAX: +91-80-2225 9503 Email : corpcomm@rajeshindia.com CIN No.: L36911KA1995PLC017077 Website : www.rajeshindia.com

June 30, 2021

To The Manager Listing, National Stock Exchange of India Ltd, Mumbai. To The Manager Listing, Bombay Stock Exchange of India Ltd Mumbai.

Sub: Secretarial Compliance Report under regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for year ended March 31, 2021

Dear Sir,

With reference to the above subject please find enclosed Annual Secretarial Compliance Report for the year ended March 31, 2021 for your record as per regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015.

Thanking you

Your Faithfully

For Rajesh Exports Ltd

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Nidhi Tulsyan Company Secretary/Compliance Officer



Global Presence in Gold and Diamond Jewellery



DEEPAK SADHU & Co

COMPANY SECRETARIES

DEEPAK SADHU

MBA (Finance), A.C.S. ACS No: **39541**, CP No: **14992** Web: <u>www.deepaksadhu.com</u> Email: compliance@deepaksadhu.com

SECRETARIAL COMPLIANCE REPORT OF M/s RAJESH EXPORTS LIMITED FOR THE YEAR ENDED 31ST MARCH 2021

We, Deepak Sadhu & Co, Company Secretaries have examined:

- (a) All the documents and records made available to us, either physically or by way of email in view of the prevailing pandemic situation of COVID -19 and explanation provided by M/s **RAJESH EXPORTS 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 2020-21 ("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: Not applicable for the current 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 current reporting period

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: Not applicable for the current reporting period

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not applicable for the current 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 current reporting period

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there-under, <u>except</u> in respect of matters specified below:-

SN	Compliance	Requirement	Deviations	Observations/	Remarks	of	the	Practicing
	(Regulations/ circulars / guidelines			Company Secretary				
	including specific clau	use)						



1	Regulation 29(1)	14 th November 2020 Board Meeting intimation given to exchange on 9 th November 2020	Intimation given to exchange prior to 5 days of the board meeting held on 14 th Nov 2020 instead of 7 days (5+2);
2	Regulation 31(1)(b)	Submission to exchange on 24 th July 2020 for the quarter ending June 2020	Shareholding pattern submitted to exchange in 24 days instead of 21 days from close of quarter June 2020;

- (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/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

SN	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.	
1	NSE	Regulation 29(1)	Rs.11800-00 fine levied by NSE vide letter dated Dec 21, 2020 (Reference# NSE/LIST-SOP/REG- 31/FINES0813)	The Company has requested for waiver of the penalty levied by the exchange;	
2	NSE	Regulation 31(1)(b)	Rs.7080-00 fine levied by NSE (Reference# NSE/LIST-SOP/REG- 31/FINES101248)	The Company has abide by the directions of the exchange and cleared the fine of Rs.7080-00 levied;	

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

SN	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA	NA	NA	NA

For DEEPAK SADHU & CO, COMPANY SECRETARIES

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Digitally signed by DEEPAK SADHU Date: 2021.07.01 19:28:50 +05'30'

(DEEPAK SADHU)

Authorised Signatory

ACS: 39541; CP No: 14992

Place: Bangalore

Date: **30th June 2021;**

UDIN: A039541C000546300

Address: No. 450, 9th cross, JP Nagar 2nd phase, Bangalore – 560 078. Mob: 9916161256 / 9886096664, Web: <u>www.deepaksadhu.com</u> Email: <u>compliance@deepaksadhu.com</u>