

**Corporate Office:**

The First, A Wing, 9th Floor, Behind Keshav Baug Party Plot,  
The First Avenue Road, Off 132 ft Ring Road,  
Vastrapur, Ahmedabad - 380015 Gujarat, India

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**Fax** : +91-79-29601210

**E-mail** : info@ratnamani.com

**Website** : http://www.ratnamani.com



RMTL/SEC/REG.24A/2021-22

June 3, 2021

<b>BSE Limited</b> Corporate Relationship Department 1 <sup>st</sup> Floor, New Trading Ring, Rotunda Building, P. J. Tower, Dalal Street, Fort, Mumbai – 400 001 Company Code : 520111	<b>National Stock Exchange of India Limited</b> "Exchange Plaza", 5th Floor, Bandra – Kurla Complex, Bandra (E), Mumbai - 400 051 Company code : RATNAMANI
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**Subject: Submission of Secretarial Compliance Report for the year ended March 31, 2021**

Dear Sir/Madam,

Pursuant to Regulation 24A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no.CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith copy of Secretarial Compliance Report issued by M/s. M. C. Gupta & Co., Practicing Company Secretaries, Ahmedabad, for the year ended March 31, 2021.

Kindly take the above on your record.

Thanking you,

Yours faithfully,

**For, RATNAMANI METALS & TUBES LIMITED**

**ANIL MALOO**

**COMPANY SECRETARY & COMPLIANCE OFFICER**

Encl.: As above

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**Regd. Office:**

17, Rajmugat Society, Naranpura Cross Road, Ankur Road, Naranpura, Ahmedabad - 380 013. Gujarat, India  
**Phone** : +91-79-27415504 / 27478700  
**E-mail** : info@ratnamani.com  
**CIN** : L70109GJ1983PLC006460

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*M. C. Gupta & Co.*  
*Company Secretaries*

**CS Mahesh C. Gupta**  
B.Com (Hons.), LL.M., MBA, ACMA, FCS

**Secretarial Compliance Report of Ratnamani Metals and Tubes Limited for the year ended 31<sup>st</sup> March, 2021**

To,  
Ratnamani Metals and Tubes Limited,  
17, Rajmugat Society  
Naranpura Char Rasta,  
Naranpura  
Ahmedabad – 380013

In terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated February 8, 2019, we have examined:

- all the documents and records made available to us and explanation provided by Ratnamani Metals and Tubes Limited ("the listed entity") CIN: (L70109GJ1983PLC006460) and having its Registered office at 17 Rajmugat Society Naranpura Char Rasta, Naranpura, Ahmedabad – 380013,
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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:

- the Securities and Exchange Board of India Act 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not Applicable during the reporting period);
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not Applicable during the reporting period);
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable during the reporting period);
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not Applicable during the reporting period);



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- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013 (Not Applicable during the reporting period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and the circulars/ guidelines issued thereunder;

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 applicable Regulations and circulars/ guidelines issued thereunder except a delay of 2 days in submission of Annual Report for the year ended 31<sup>st</sup> March, 2020 under Regulation 34.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar 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 letter, department, etc.	Observations/Remarks of the Practicing Company Secretary, if any
1	BSE Limited	Delay of 2 days under Regulation 34 in submission of Annual Report for the year 2019-20.	A Monetary fine of Rs. 2,000/- per day plus GST (Rs. 4,720/-) under SEBI-SOP was paid on 12 <sup>th</sup> January, 2021 and the Board has taken note of same in its Board Meeting held on 2 <sup>nd</sup> February, 2021.	NIL
2	National Stock Exchange of India Limited	Delay of 2 days under Regulation 34 in submission of Annual Report for the year 2019-20.	A Monetary fine of Rs. 2,000/- per day plus GST (Rs. 4,720/-) under SEBI-SOP was paid on 12 <sup>th</sup> January, 2021 and the Board has taken note of same in its Board Meeting held on 2 <sup>nd</sup> February, 2021.	NIL



- (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 reports	Observations made in the secretarial compliance report for the year ended (years to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the Action taken by the listed entity
NOT APPLICABLE				

For M. C. Gupta & Co.  
Company Secretaries  
UCN: S1986GJ003400

*Mahesh Gupta*

Mahesh C Gupta  
Proprietor  
FCS: 2047 (CP: 1028)  
UDIN: F002047C000365729

Place: Ahmedabad  
Date: 25<sup>th</sup> May, 2021

