



**May 19, 2021**

BSE Limited  
Corporate Relationship Department  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai – 400 001

**BSE: Scrip Code: 543251**

The Manager, Listing Department  
National Stock Exchange of India Ltd.  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (E), Mumbai – 400 051

**NSE Symbol: RVHL**

**Sub.: Secretarial Compliance Report pursuant to regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015**

**Dear Sir/Mam,**

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, please find enclosed Secretarial Compliance Report duly issued by Amit K. & Associates, Company Secretaries for the financial year ended March 31, 2021

This is for your kind information and record please.

Thanking you,  
**For Ravinder Heights Limited**

**ALKA**  
Digitally signed  
by ALKA  
Date: 2021.05.19  
17:38:51 +05'30'

**Alka**  
**Company Secretary and Compliance Officer cum CFO.**

Enclosed as above

**Ravinder Heights Ltd.**

CIN: U70109PB2019PLC049331

Registered Office: Ground Floor, PDS Block, Ambala-Chandigarh Highway, Lalru, Punjab 140501

Corporate Office: 7th Floor, DCM Building, 16 Barakhamba Rd. New Delhi 110001

**T: +91 11 43639000 F: +91 11 43639015 E: info@ravinderheights.com W: www.ravinderheights.com**

**Secretarial compliance Report of Ravinder Heights Limited for the year ended March 31, 2021**

To

**RAVINDER HEIGHTS LIMITED**

Corp. Office: 7th Floor, DCM Building,

16, Barakhamba Road,

New Delhi 110001

We, Amit K & Associates have examined:

- (a) All the documents and records made available to us and explanation provided by **RAVINDER HEIGHTS 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 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;
- (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 to the company during the review period*)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*Not applicable to the company during the review period*)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (*Not applicable to the company during the review period*)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (*Not applicable to the company during the review period*)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and 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 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			

## Continuation Sheet

- (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 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 issued thereunder:

Sr.No.	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
<b>NIL</b>				

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

S.No.	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
<b>Not Applicable</b>				

Further During the year under review:

Order of NCLT, Chandigarh dated 9<sup>th</sup> September, 2020 approved the Scheme of Arrangement between Panacea Biotec Limited (**“Demerged Company”**) and Ravinder Heights Limited (the **“Company”/ “Resulting Company”**) and their respective shareholders and creditors under sections 230 to 232 and section 66 and other relevant provisions of the Companies Act, 2013 (**“Scheme”** or **“Scheme of Arrangement”**).

In term of Clause 13.1 of the Scheme of Arrangement become effective, and in consideration to the demerger of the Demerged Undertaking and transfer and vesting thereof with and into Ravinder Heights Limited (the **“Company”/ “Resulting Company”**), the Company shall, without any further act or deed and without any further payment, issue and allot the equity shares and preference shares at par on a proportionate basis to each member of Panacea Biotec Limited (**“Demerged Company”**) whose name is recorded in the register of members of the Demerged Company as holding equity shares and preference shares on the Record Date in accordance with their respective entitlement in the following proportion/ratio:

- (a) For every 1 (one) equity shares of face value of Re. 1/- each held in the Demerged Company, as on the Record Date, every equity shareholder of the Demerged Company shall receive 1 (One) equity share of face value of Re. 1/- each of the Resulting Company, credited as fully paid-up.

(b) For every 100 (One Hundred) 0.5% cumulative non-convertible and non-participating preference shares of face value of Rs.10/- each held in the Demerged Company, as on the Record Date, every preference shareholder of the Demerged Company receive 1 (One) preference share of face value of Rs. 10/- each of the Resulting Company, credited as fully paid-up.

Pursuant to the scheme of arrangement between Panacea Biotec limited (Demerged company) and Ravinder Height Limited (Resulting Company) as approved by the Hon'ble NCLT, Chandigarh bench vide order dated 09/09/2020 Equity Shares got listed on the BSE Limited and National Stock Exchange of India Limited with effect from **18<sup>th</sup> December, 2020**

Further we have to state that we have not carried out the physical inspection of any records maintained by the Company due to prevailing lock down conditions owing to COVID 2019 across the country. We have relied on the records as made available by the Company by digital mode and also on the Management Representation Letter issued by the Company.

For **AMIT K & ASSOCIATES**  
**Company Secretaries**

**Amit  
Kumar** Digitally signed  
by Amit Kumar  
Date: 2021.05.19  
14:26:24 +05'30'

**AMIT KUMAR**  
**M.NO.: A46941**  
**CP: 17591**  
**UDIN: A046941C000343457**  
**Date:19.05.2021**  
**Place: Delhi**