



RAJ OIL MILLS LTD.

Date: May 30, 2022

To,

Department of Corporate Relationship BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai 400 001. <i>Scrip Code: 533093</i>	Corporate Relationship Department National Stock Exchange of India Exchange Plaza, Bandra Kurla Complex, Mumbai 400 051. <i>Symbol: ROML</i>
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Sub.: Annual Secretarial Compliance Report under Regulation 24A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended on 31st March 2022

Dear Sir/Madam,

Pursuant to Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are herewith submitting Annual Secretarial Compliance Report of the Company for the year ended 31st March 2022 issued by Amit R. Dadheech & Associates, Practicing Company Secretaries.

Request you to kindly take this letter on record.

Thanking You.

Yours faithfully,

For Raj Oil Mills Limited

Khushbu Bohra

Company Secretary & Compliance Officer

Encl: As above



**SECRETARIAL COMPLIANCE REPORT OF RAJ OIL MILLS LIMITED FOR THE
FINANCIAL YEAR ENDED MARCH 31, 2022**

To,
Raj Oil Mills Ltd.,
224-230, Bellasis Road,
Mumbai – 400008

We, Amit R. Dadheech & Associates, Practicing Company Secretary, have examined:

- a) all the documents and records made available to us and explanation provided by **Raj Oil Mills Ltd (“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, 2022 *(“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 financial year under review)*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not Applicable to the Company during the financial year under review)*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not Applicable to the Company during the financial year under review)*
- 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 financial year under review)*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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			

- 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, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NA				

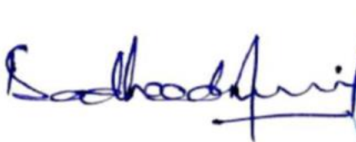

- d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Regulations/ circulars /guidelines including specific clause) of previous year	Action taken	Pending Compliance Requirement (Regulations/ circulars /guidelines including specific clause) of previous year
1.	Regulation 17(1) Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director and Fines has been Levied by the Both the Stock Exchanges for Non- Compliances of the said Regulation for two subsequent Quarters i.e, December 2020 and March 2021	<p>The Company has filed waiver application with both the Stock Exchanges and the National Stock Exchange of India (NSE) vide letter dated March 17, 2022, have waived off the fine with respect to non-compliance of regulation 17 of SEBI LODR 2015</p> <p>The Application for waiver of penalty is still pending with BSE Limited</p>	NA



Amit R. Dadheech & Associates
Company Secretaries

For Amit R. Dadheech & Associates

Amit R. Dadheech

Date: May 27, 2022.

Place: Mumbai

UDIN: A022889D000407009