



RAGHUVIR SYNTHETICS LIMITED

REGD. OFF.: RAKHIAL ROAD, RAKHIAL, AHMEDABAD-380 023, INDIA

PHONE : 079-22911015 - 22911902 - 22910963

Email : raghuvirad1@sanchamēt.in

Website : <http://www.raghuvir.com>

CIN : L17119GJ1982PLC005424

Date: 30/05/2022

To,
The Manager,
Department of Corporate Services,
BSE Ltd.
Dalal Street, Fort
Mumbai – 400 001

Sub.-: Submission of Annual Secretarial Compliance Report under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 for the year ended 31st March, 2022

Ref.-: Scrip Code - 514316

Respected Sir / Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report for the Year ended 31st March, 2022 received from M/s. **SPAN & Co. Company Secretaries LLP**, Practicing Company Secretary, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019.

Kindly take the same on your records and acknowledge the receipt.

Thanking you,

Yours faithfully,

FOR, RAGHUVIR SYNTHETICS LIMITED

FOR, RAGHUVIR SYNTHETICS LIMITED


DIRECTOR/AUTHORISED SIGNATORY
SUNIL R. AGARWAL

(CHAIRMAN & MANAGING DIRECTOR)

DIN: 00265303

Encl.: As Above



ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
“RAGHUVIR SYNTHETICS LIMITED”

for the year ended 31st March, 2022

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019]

We, SPAN & Co. Company Secretaries LLP, have examined:

- all the documents and records made available to us and explanation provided by **Raghuvir Synthetics Limited**, having CIN: L17119GJ1982PLC005424 and its Registered Office situated at Rakhial Road, Rakhial, Ahmedabad- 380023, Gujarat, India (“the listed entity”),
- the filings/ submissions made by the listed entity to the Stock Exchanges,
- website of the listed entity,
- other relevant documents and filings,

for the year ended 31st March, 2022 (“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”) and the 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 [“SEBI (LODR) Regulations, 2015”];
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - *Not applicable during the review period*



- c) The 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 during the review period*
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 till **12th August, 2021** & the Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 w.e.f. **13th August, 2021**; *Not applicable during the review period*
- f) *The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 till **8th August 2021**; *Not applicable during the review period*
- g) *Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 till **8th August 2021**; *Not applicable during the review period*
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and circulars/guidelines issued thereunder;

and based on the above examination, we hereby report that during the above 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			

**The said Regulations have been merged into the Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021 w.e.f 9th August, 2021*

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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 Violations	Details of Action taken E.g.fines/ warning letter/ debarment etc.	Observations/ Remarks of the Practicing Company Secretary, if any
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 previous report	Observations made in the secretarial compliance report	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

Place : Ahmedabad
Date: 30/05/2022




Premnarayan Ramanand Tripathi
(Designated Partner)
SPAN & Co. Company Secretaries LLP
FCS: 8851
COP: 10029
PR: 800/2020
UDIN: F008851D000424673

Note: This report is to be read with our letter of even date which is annexed as "Annexure A" and forms an integral part of this report.

Annexure-A

Our report of even date is to be read along with this letter:

1. Maintenance of records with respect to compliance of applicable laws as referred in this Annual Secretarial Audit Report ("ASCR") is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.
2. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
3. Where ever required, we have obtained the Management representation about the compliance of applicable laws as referred in this ASCR and happening of events etc.
4. ASCR is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity. Our examination was limited to the verification of procedures on test basis.

Place: Ahmedabad
Date: 30/05/2022




Premnarayan Ramanand Tripathi
(Designated Partner)
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