

Date: 17/05/2021

**TO,
THE MANAGER,
DEPARTMENT OF CORPORATE SERVICES
BSE LTD.
PHIROZE JEEJEEBHOY TOWERS,
DALAL STREET,
MUMBAI - 400001**

**Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021
as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015 ("Listing Regulations")
Ref: Raghav Productivity Enhancers Limited, BSE Scrip Code: 539837**

Dear Sir/ Ma'am,

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021.

Kindly take the same on your records and oblige.

Thanks & Regards

For Raghav Productivity Enhancers Limited

**(Neha Rathi)
Company Secretary
M.No.: A38807
Encl.-A/A**

Registered Office:

Office No. 36, 4th Floor, Alankar Plaza, Central Spine, Vidhyadhar Nagar, Jaipur, Rajasthan - 302 023

CIN: L27109RJ2009PLC030511 | P: +91 141 2235760 - 61 | E: rammingmass@gmail.com | W: www.rammingmass.com



ARMS & ASSOCIATES LLP

Practicing Company Secretaries

24 Ka 1, Jyoti Nagar, Jaipur-302005, Rajasthan

Telephone: +91-141-2740924, Mob No.: +91-9828050920

Email: cssandeep@armsandassociates.com

website: www.armsandassociates.com

SECRETARIAL COMPLIANCE REPORT

of

RAGHAV PRODUCTIVITY ENHANCERS LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

We, M/s ARMS & Associates LLP, Company Secretaries have examined:

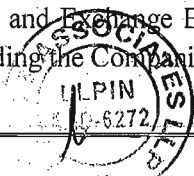
- All the documents and records made available to us and explanation provided by **Raghav Productivity Enhancers Limited** (*"the Listed Entity"*),
- the filings/ submissions made by the Listed Entity to the stock exchanges,
- website of the Listed Entity,
- any other documents/ filing, as may be relevant, which has been relied upon to make this certification,

for the Financial Year ended 31st 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 review 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 review period**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable during the review period**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable during the review period**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable during the review period**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;





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and circulars/ guidelines issued thereunder;

and based on our examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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.
- (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 letters, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	BSE Ltd (Stock Exchange)	Regulation 17(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director.	Levied fine of Rs.3,30,000/- (Rupees Three Lacs Thirty Thousand Only)	<p>It was informed by the listed entity that because of the clerical error, non-executive director was categorized as executive director, due to which the composition of the Board was not in compliance with the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The said clerical error has been ratified.</p> <p>The listed entity has submitted its representation to the Stock Exchange and no further action has been taken by the Stock Exchange till the date of report.</p> <p>Therefore, it seems that the stock exchange has dropped the proceeding in this matter.</p>





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2.	BSE Ltd (Stock Exchange)	Regulation 18(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for non-compliance with the constitution of Audit Committee.	Levied fine of Rs.1,32,000/- (Rupees One Lacs Thirty Two Thousand Only)	<p>It was informed by the listed entity that because of the clerical error, non-executive director was categorized as executive director, due to which the constitution of Audit Committee was not in compliance with the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The said clerical error has been ratified.</p> <p>The listed entity has submitted its representation to the Stock Exchange and no further action has been taken by the Stock Exchange till the date of report.</p> <p>Therefore, it seems that the stock exchange has dropped the proceeding in this matter.</p>
3.	BSE Ltd (Stock Exchange)	Regulation 19(1)/ 19(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for non-compliance with the constitution of Nomination and Remuneration Committee.	Levied fine of Rs.1,32,000/- (Rupees One Lacs Thirty Two Thousand Only)	<p>It was informed by the listed entity that because of the clerical error, non-executive director was categorized as executive director, due to which the constitution of Nomination and Remuneration Committee was not in compliance with the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The said clerical error has been ratified.</p> <p>The listed entity has submitted its representation to the Stock Exchange and no further action has been taken by the Stock Exchange till the date of report.</p>





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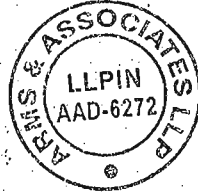
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				Therefore, it seems that the stock exchange has dropped the proceeding in this matter.
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- (d) The Listed Entity has taken the following actions to comply with the observations made in previous reports:
Not Applicable being no observation in previous report.



Date: 13th May, 2021
Place: Jaipur
UDIN: F005398C000290188

For ARMS & Associates LLP
Company Secretaries
ICSI URN: P2011RJ023700

Sandeep Kumar Jain
Designated Partner
FCS 5398 CP No.4151