



RAVI KUMAR DISTILLERIES LIMITED

Regd. Office : C-9, C-10, Industrial Estate, 2nd Main Road, Thattanchavady, Puducherry - 605 009.

Phone : 0413 - 2244008, 2244004, 2244007, E-mail : cs@ravikumardistilleries.com

Website : www.ravikumardistilleries.com CIN No. : L51909PY1993PLC008493, GSTIN : 34AABCR4195D1ZJ

RKDL/2021

Date: 30.06.2021

| | |
|---|---|
| To Secretary Listing Department BSE Limited Department of Corporate Services Phiroze Jeejeebhoy Dalal Street, Mumbai - 400001 Scrip Code: 533294 | To Secretary Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Mumbai - 400050 Scrip Code: RKDL |
|---|---|

Dear Sir,

SUB: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2021

With reference to SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find enclosed herewith Annual Secretarial Compliance Report dated 24th June, 2021 for the year ended March 31, 2021 issued by M/s. Uttam Shetty & Co, Company Secretaries, (CPN: 16861), Mumbai.

Kindly take the same in your records.

Thanking you,

For **RAVI KUMAR DISTILLERIES LIMITED**

R. V. RAVIKUMAR
MANAGING DIRECTOR
DIN: 00336646

Encl: As above



SECRETARIAL COMPLIANCE REPORT OF RAVI KUMAR DISTILLERIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2021.

We Uttam Shetty & Co, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by RAVI KUMAR DISTILLERIES 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 31st March, 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; ***(Not applicable to the Company during the review period).***
- (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).***

Contd...2/-



(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 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 |
|--------|--|---|---|
| 1 | Regulation 14 of SEBI(LODR) 2015- Payment of listing fee to BSE and NSE for the financial year 2020-2021 | Non-payment of Listing fees. | The Company has not paid Annual Listing fees to BSE and NSE for the financial year 2020-2021. |
| 2 | Regulation 46 of SEBI(LODR) 2015-Disclosure of information on website of the company | Newspaper cutting of Advertisements made/sought to be made for publishing notice of board meeting for approval of financial results for quarter and year ended 31 st March 2020 not disclosed in the website of the company due to non-publication as detailed in point no. 3(i) below. | NIL |
| 3 | Regulation 47 of SEBI(LODR) 2015-Adverstiemnt of following information in the newspaper i) notice of meeting of the board of directors where financial results shall be discussed ii) financial results, as specified in Regulation 33, along-with the modified opinion(s)or reservation(s), if any, expressed by the auditor: | i) Notice of Board Meeting held on 31 st July 2020 for approval of financial results for quarter and year ended 31 st March 2020 was not published in the newspapers. ii) Financial results approved on 31 st July 2020 for the above quarter were published in newspaper on 06 th August 2020 instead of 02 nd August 2020. iii) For board meeting held on 12th November, 2020 for considering financial results for quarter and half year ended 30 th September 2020, notice was given to stock exchange(s) on 03 rd November 2020 but published in newspaper on 09 th November 2020. | 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. |
|---------|-----------------|--|--|---|
| 1 | SEBI | <p>Violation made under following regulations: Regulations 3 (a), (b), (c), (d), 4(1), 4 (2) (f) and (k) of the (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 Regulations 57(1), 60(4) (a) and 60 (7) (a) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 (hereinafter referred to as 'ICDR Regulations') and Clauses 2(IV)(H)(24); 2(VII)(G); 2(X)(A)(1)(h) and 2(X)(A)(3)(a); 2(X)(A)(5); and 2(XVI)(B)(2) of Part A of Schedule VIII read with Regulation 57 (2) (a) of the ICDR Regulations.</p> | <p>SEBI vide order dated 21st August, 2020 levied penalty on the Company, promoters and directors as under: i) Rs. 2,00,00,000 (Rs. Two crores only) imposed on company. ii) Rs. 31,00,000 (Rs. Thirty-One Lacs only) imposed on Promoter Mr. R.V. Ravikumar iii) Ravi Kumar Properties Private Limited Rs 1,00,000 (Rs. One Lac only). iv) Rs 6,00,000 (Rs. Six Lacs only) each on Promoter Mrs. R. Amirthavalli, former director Mrs. S. Vijayalaxmi, whole-time director Mr. Badrinath Gandhi, independent director Mr. Popatlal Khatariya, independent director Mr. K.S.M Rao and independent director Mr. Ashok Shetty .</p> | <p>As per the information provided by the Company, as on 31st March 2021 Mr. K.S.M Rao, Mr. Popatlal Khataria, Mr Ashok Shetty and M/s. Ravi Kumar Properties Private Limited has paid their penalty amount and other noticees including the Company sought extension from SEBI for paying penalty in installment.</p> |
| 2 | SEBI | <p>Violations made under Regulation 29 and 31 of SEBI(SAST) Regulations, 2011, Regulation 13 of SEBI(PIT) Regulations, 2015</p> | <p>SEBI vide order dated 28th December, 2020 levied Penalty of Rs. 1,00,000 (Rs. One Lac only) imposed on Mr. R V Ravikumar, Chairman and Managing Director of the company</p> | <p>As per the information provided by the Company, the penalty amount not paid till 31st March 2021</p> |




Contd...4/-

(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... (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 |
|---------|--|---|--|--|
| 1 | NIL | N. A | N. A | N. A |

Note: This Report is issued on the basis of information/ documents / materials (data) seen/verified made available to us. However due to current lockdown situation under COVID -19 some of the data made available us in electronic form by the Company and such data shall be verified physically after lockdown is lifted.

**For Uttam Shetty & Co.
Company Secretaries**


Uttam Shetty
Proprietor
M. No.: F8691
C.P. No.: 16861



UDIN: F008691C000507783

Place: Mumbai
Date: 24/06/2021

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

To
The Board of Directors,
Ravi Kumar Distilleries Limited.
C-9, C-10, Industrial Estate,
2nd Main Road, Thattanchavady,
Puducherry – 605009.

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

1. Maintenance of record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these records based on our verification of the same.
2. We have followed the practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
4. Wherever required, we have obtained the Management representation about the compliance of SEBI laws, rules and regulations thereof.
5. The compliance of the provisions of SEBI laws, rules, regulations is the responsibility of management. Our examination was limited to the verification of compliances done by the Company.
6. As regards the books, papers, forms, reports and returns filed by the Company under the above mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timelines of the filing of various forms, reports, returns and documents that need to be filed by the Company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.
7. This report 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 Company

For Uttam Shetty & Co.
Company Secretaries


Uttam Shetty
Proprietor
M. No.: F8691
C.P. No.: 16861
UDIN: F008691C000507783



Place: Mumbai

Date: 24/06/2021