



RAVI KUMAR DISTILLERIES LIMITED

Regd. Office : C-9, C-10, Industrial Estate, 2nd Main Road, Thattanchavady, Puducherry-605009.
Phone : 0413-2244007, 2248888, 2248887.

E-mail: cs@ravikumardistilleries.com, Website: www.ravikumardistilleries.com
CIN No.L51909PY1993PLC008493. GSTIN/UIN: 34AABCR4195D1ZJ.

RKDL/2022-2023

30.05.2022

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

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31,2022

With reference to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find herewith Annual Secretarial Compliance Report dated 30th May, 2022 for the year ended March 31, 2022 issued by M/s. Uttam Shetty & Co, Company Secretaries (CP: 16861), Mumbai.

Kindly take the same in your records.

Thanking you,

Yours faithfully,
For RAVI KUMAR DISTILLERIES LIMITED

Badrinath
Sankardass
Gandhi

Digitally signed by Badrinath
Sankardass Gandhi
Date: 2022.05.30 17:13:50
+05'30'

BADRINATH S GANDHI
EXECUTIVE DIRECTOR
DIN: 01960087



UTTAM SHETTY & CO.

Company Secretaries

B-01, Om Mahanta Kumar CHS Ltd, Mahanta Road Extn., Near Utkarsh Mandal Circle, Vile Parle East,
Mumbai-400057 T: 022 2616 1191 M: 98208 11489 / 98694 82761 E-mail : uttamshetty@gmail.com

SECRETARIAL COMPLIANCE REPORT OF RAVI KUMAR DISTILLERIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2022.

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") having CIN **L51909PY1993PLC008493**
- (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, 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; *(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).*



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- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations 1993 regarding the Companies Act and dealing with clients **(Not applicable to the Company during the review period)**.
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 2021-22.	Delay in payment of Listing fees by the Company to BSE and NSE for the financial year 2021-2022.	Listing fees paid after due date . NSE listing fee was paid on 09/12/2021 and BSE Listing fee was paid on 18/12/2021.
2	Regulation 30 of SEBI(LODR) 2015- Disclosure of material events or information	Outcome of board meeting where financial results are approved shall be submitted to Stock Exchange (SE) within 30 minutes of conclusion of meeting. A) In a meeting held on 25th June, 2021, meeting was concluded at 17:01 , however outcome of meeting was submitted to SE at 18:26. b) In a meeting held on 15th November, 2021, meeting was concluded at 16:18, however outcome of meeting was submitted to SE at 17:05.	Observation : Delay in submission of outcome of board meetings. Management representation: Delay in submission was on account of technical/internet related issues. Further, said meetings were concluded post market hours, hence impact of the same is 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 Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:



Contd...3/-

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	Non-payment of penalty of Rs. 31.00 Lacs imposed on Mr. R.V. Ravikumar, Promoter under Section 15HA and 15HB for violation committed under various SEBI Regulations as detailed in our earlier report pertaining to financial year 2020-21.	Complaint U/s 26 & 26B r/w Section 24 (2) of the SEBI Act 1992 & Section 193 and Section 200 of the Code of Criminal Procedure 1973 has been filed against Mr. R.V. Ravikumar by the SEBI for non-payment of Penalty levied by the Adjudication Order No. Order/AA/AR/2020-21-8690-8721 dated 21.08.2020 before the Designated Special Court for SEBI cases court of sessions-GR. Mumbai and the matter is pending for hearing.	Failure to pay the penalty imposed by the SEBI vide Adjudication Order No. Order/AA/AR/2020-21-8690-8721 dated 21.08.2020 on Promoter Mr. R.V. Ravikumar in the year 2020.
2	SEBI	Partial payment of Penalty of Rs. 200.00 Lacs imposed on Company under Section 15HA and 15HB for violation committed under various SEBI Regulations as detailed in our earlier report pertaining to financial year 2020-21. i.e. out of Rs. 200.00 lakhs only Rs. 36.30 Lacs was paid by the company.	Complaint U/s 26 & 26B r/w Section 24 (2) of the SEBI Act 1992 & Section 193 and Section 200 of the Code of Criminal Procedure 1973 has been filed against the Company and its Directors by the SEBI for non-payment of Penalty levied vide Adjudication Order No. Order/AA/AR/2020-21-8690-8721 dated 21.08.2020 before the Designated Special Court for SEBI cases court of sessions-GR. Mumbai and the matter is pending for hearing.	Failure to pay the penalty imposed by the SEBI vide Adjudication Order No. Order/AA/AR/2020-21-8690-8721 dated 21.08.2020 on Company in the year 2020.



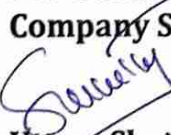
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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	No Listing fees have been paid by the Company to BSE and NSE for the financial year 2020-2021.	2021	Listing fee of NSE for the year 2020-21 was paid on 24/12/2021 and Listing fee of BSE was paid on 08/12/2021.	NIL
2	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 3(i) below.	2021	During the F. Y 2021-2022 the Company has taken necessary steps for newspaper publication within the stipulated period.	NIL
3	<p>i) Notice of board meeting held on 31st July 2020 for approval of financial results for quarter and year ended 31st March 2020 was not published in the newspapers.</p> <p>ii) Financial results approved on 31st July 2020 for the above quarter were published in the newspaper on 06th August 2020 instead of 2nd August 2020.</p> <p>iii) For board meeting held on 12th November 2020 for considering financial results for quarter and half year ended 30th September 2020, notice was given to Stock Exchange on 03rd November 2020 but published in newspaper on 09th November 2020.</p>	2021	During the F. Y 2021-2022 the Company has taken necessary steps for news-paper publication within the stipulated period, wherever applicable.	NIL



4	<p>As per the information provided by the Company; as on 31st March 2021 Mr. K.S.M Rao, Mr. Papatlal Khataria, Mr Ashok R Shetty and M/s. Ravi Kumar Properties Private Limited has paid their penalty amount.</p> <p>(Details of action taken by SEBI)</p> <p>Further, Penalty of i) Rs. 200.00 lacs (Rs. Two crore only) imposed on company. ii) Rs. 31.00 Lacs (Rs. Thirty One Lacs only) imposed on Promoter Mr. R.V. Ravikumar iii) Rs. 6.00 Lacs (Rs. Six Lacs only) on Promoter Mr. R. Amirthavalli iv) Rs. 6.00 Lacs (Rs. Six Lacs only) on erstwhile director Mrs. S. Vijayalaxmi v) Rs. 6.00 Lacs (Rs. Six Lacs only) on whole-time director Mr. Badrinath Gandhi and the above said noticees including the Company sought extension from SEBI for paying penalty in installment.</p>	2021	Out of penalty of Rs.200.00 Lacs the Company has paid Rs. 36.30 Lacs only. and other remaining amount not paid.	Criminal complaint is filed by SEBI for non-payment of Penalty levied vide Adjudication Order No. Order/AA/AR/2020-21-8690-8721 dated 21.08.2020 before Designated Special Court for SEBI cases court of sessions-GR. Mumbai against Company and its directors.
5	<p>As per the information provided by the Company, the penalty amount not paid till 31st March 2021.</p>	2021	Penalty of Rs. 1.00 (Rs. One Lac only) imposed on Mr. R V Ravikumar, Chairman and Managing Director of the company still not paid.	NIL

For Uttam Shetty & Co
Company Secretaries


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



UDIN: F008691D000423919

Place: Mumbai
Date: 30/05/2022

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"

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: F008691D000423919

Place: Mumbai

Date: 30/05/2022

