



## RAVI KUMAR DISTILLERIES LIMITED

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

Phone : 0413 - 2244007, 2248888, 2248887 E-mail : cs@ravikumardistilleries.com

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

RKDL/2020-2021

Date: July 31, 2020

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

Dear Sir,

**SUB: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2020**

With reference to SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find enclosed herewith Annual Secretarial Compliance Report dated 30<sup>th</sup> July, 2020 for the year ended March 31, 2020 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





# 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 31<sup>ST</sup> MARCH 2020.

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 31<sup>st</sup> March, 2020 ("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 - Payment of listing fee to BSE	Delay in payment by 154 days.	
2	Regulation 14 - Payment of listing fee to NSE	Delay in payment by 122 days	
3	Regulation 34(1)- Annual Report	Delay in submission of Annual report to Stock Exchange/s by 1 day	

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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.
NIL	NIL	NIL	NIL	NIL

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

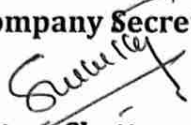
Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL	NIL	NIL	NIL	NIL

Contd...3/-



*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: L51909TN1993PLC025981**

**Place: Mumbai  
Date:30/07/2020**

*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*  
**Uttam Shetty**  
**Proprietor**  
**M. No.: F8691**  
**C.P. No.: 16861**  
**UDIN: L51909TN1993PLC025981**



**Place: Mumbai**  
**Date: 30/07/2020**