

RAM/SECT/BSE/013/24-25

Date: May 29, 2024

To  
**The Corporate Relationship Department**  
**BSE Limited**  
1<sup>st</sup> Floor, Rotunda Building, P.J. Towers,  
Dalal Street, Mumbai - 400 001.

**Sub: Annual Secretarial Compliance Report for the Financial Year 2023-24**

**Scrip Code: 530951 | Stock Symbol: RAMINFO**

Dear Sir / Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report pursuant to Regulation 24A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the year ended March 31, 2024 issued by Mr. D.S. Rao, Practicing Company Secretary (C.P. No.: 14487).

This is for your information and records.

Thanking you,

For **RAMINFO LIMITED**

**K. Kiran Kumar Reddy**  
**Company Secretary & Compliance Officer**

Encl: a/a

## SECRETARIAL COMPLIANCE REPORT

I, **D.S.RAO, PCS** have examined:

- (a) All the documents and records made available to us and explanation provided by Raminfo 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 report,

for the financial year ended 31<sup>st</sup> March,2024 ("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;
- (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 listed entity for the audit period;*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations,2021; - *Not Applicable to the listed entity for the audit period;*
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations,2021; - *Not Applicable to the listed entity for the audit period;*
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Depositories Act, 1996;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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

  




- I. (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:

|  |  |
|--|--|
| Compliance Requirement (Regulations/circulars/ guidelines including specific clause) | Delay in submission of quarterly compliances for the Quarters June'2019, June'2020 & June'2021   |
| Regulation/ CircularNo.  | a) Reg 33 for June' 2019<br>b) Reg 29(2) & 29(3) for June' 2020<br>c) Reg. 13(3) & 31 for June 2021  |
| Deviations   | <i>Late Submission of Quarterly Compliances during the years 2019; 2020 &amp; 2021</i>   |
| Action Taken   | BSE Limited  |
| Type of Action   | Levied Fine for delay in submission  |
| Details of Violation   | Delay in submission of quarterly compliances   |
| Fine Amount  | Rs. 1,33,340/- (Including GST)   |
| Observations/ Remarks of the Practicing Company Secretary                            | BSE levied fine for delay in submission of quarterly compliances during the years 2019-20 & 2020-21 (as cited above) during the financial 2023-24.   |
| Management Response  | During the Covid period due to lack of co-ordination among and facilities at employees at their home some delays occurred in submission of quarterly returns. The Company has duly replied to the BSE at that time the cause of reason. However, BSE levied fine during the year under review for the said delays occurred then. |
| Re- marks  | The Company paid fine as per the demand of BSE.  |

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

| S. No. | Observations/ Remarks of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2023. | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Details of violation / deviations and actions taken / penalty imposed, if any on the listed entity | Remedial actions, if any, taken by the listed entity | Comments of the PCS on the actions taken by the listed entity |
|--------|---|---|---|--|--|---|
|        | NIL   |   |   |  |  |   |

- II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:





| Sr.No. | Particulars  | Compliance Status<br>(Yes/No/ NA) | Observations/<br>Remarks by PCS* |
|--------|--|-----------------------------------|----------------------------------|
| 1.     | Compliances with the following conditions while appointing/re-appointing an auditor  |                                   |                                  |
|        | NOT APPLICABLE   |                                   |                                  |
| 2.     | Other conditions relating to resignation of statutory auditor  |                                   |                                  |
|        | NOT APPLICABLE   |                                   |                                  |
| 3.     | The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure-A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019 | NA                                | NIL                              |

**III.** we hereby report that, during the review period the compliance status of the listed entity is appended as below:

| Sr. No. | Particulars   | Compliance status<br>(Yes/No/ NA) | Observations/<br>Remarks by<br>PCS* |
|---------|---|-----------------------------------|-------------------------------------|
| 1.      | <b>Secretarial Standards:</b><br><br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).  | YES                               | NIL                                 |
| 2.      | <b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/ circulars/ guidelines issued by SEBI.</li> </ul>  | YES<br><br>YES                    | NIL<br><br>NIL                      |
| 3.      | <b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/ information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website.</li> </ul> | YES<br><br>YES<br><br>YES         | NIL<br><br>NIL<br><br>NIL           |





|     |   |            |            |
|-----|---|------------|------------|
| 4.  | <b>Disqualification of Director:</b><br>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.   | YES        | NIL        |
| 5.  | <b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b><br><br>(a) Identification of material subsidiary companies.<br>(b) Disclosure requirement of material as well as other subsidiaries.   | NA<br>YES  | NIL<br>NIL |
| 6.  | <b>Preservation of Documents:</b><br><br>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.  | YES        | NIL        |
| 7.  | <b>Performance Evaluation:</b><br>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.   | YES        | NIL        |
| 8.  | <b>Related Party Transactions:</b><br><br>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or<br>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained. | YES<br>YES | NIL<br>NIL |
| 9.  | <b>Disclosure of events or information:</b><br><br>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.   | YES        | NIL        |
| 10. | <b>Prohibition of Insider Trading:</b><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.   | YES        | NIL        |



|     |  |     |     |
|-----|--|-----|-----|
| 11. | <b>Actions taken by SEBI or Stock Exchange(s), if any:</b><br><br>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein. | YES | NIL |
| 12. | <b>Additional Non-compliances, if any:</b><br>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.  | YES | NIL |

**Assumptions & Limitation of scope and Review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**PLACE: HYDERABAD  
DATE: MAY 28, 2024**



**CS D.S.RAO; PCS  
ACS: 12394  
CP.NO.: 14487  
DIN: A012394F000472678  
PEER REVIEW CER NO.: 1817/2022**