



Rajvir Industries Limited



Tradition of Innovation
Govt. Recognised Star Export House

CIN-L17116TG2004PLC044053

Rajvir/Sec./SE/12/2019-20
30th May, 2019

Department of Corporate Services BSE, Limited, 1st Floor New Trading Ring, Rotunda Building, P.J. Towers, Dalal Street, Fort-Mumbai-400001	National Stock Exchange of India Ltd., (NSE) Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051.
---	--

Subject: Compliance under Regulation 24A of the Securities and Exchange Board Of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Ref. No.: Scrip Code: 532665

Scrip ID: RAJVIR

Dear Sirs,

In Compliance with the provisions of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report duly issued by S.S Marthi, Practising Company Secretary for the Financial year ended 31st March, 2019.

Kindly take the same on your record.

Thanking you
Yours faithfully,
For Rajvir Industries Limited

Ritesh Kumar Agarwal
Managing Director
(DIN-00513341)



Encl: As Above



SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2019

To

M/S RAJVIR INDUSTRIES LIMITED
1ST FLOOR, SURYA TOWERS,
105, S.P. ROAD,
SECUNDERABAD 500003

I, Soma Sekhar Marthi, Proprietor of Marthi & Co, Company Secretaries, Hyderabad have examined:

- (a) all the documents and records made available to us and explanation provided by M/s RAJVIR INDUSTRIES LIMITED (hereinafter referred to as "the listed entity") bearing CIN: L17116TG2004PLC044053 and having its registered office at 1st Floor, Surya Towers, 105, S.P. Road, Secunderabad - 500003, Telangana,
- (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 March 31, 2019 (hereinafter referred as "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:-

For MARTHI & CO.
COMPANY SECRETARIES


S.S. MARTHI
COMPANY SECRETARY
F.C.S-1989 CP-1937

MARTHI & CO

COMPANY SECRETARIES

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; ("Listing Regulations");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the period under review)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable during the period under review)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable during the period under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and share Transfers Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of Securities issued;

and circulars/ guidelines issued thereunder, and based on the above examination, I 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) Regulations, 2015.	Annual Listing fee for the FY 2018-19 to BSE and NSE has not been paid.	It is informed that the Company is in the process of paying the same.

For MARTHI & CO.
COMPANY SECRETARIES

S.S. MARTHI
COMPANY SECRETARY
F.C.S-1989 CP-1937

MARTHI & CO

COMPANY SECRETARIES

- 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 my 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.	Observation s/ remarks of the Practicing Company Secretary, if any.
1.	Bombay Stock Exchange have imposed fine on the company pursuant to SEBI circular No.SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018 for the quarter ended March 2019.	Non compliance of Regulation 6(1) of SEBI (LORD) Regulations , 2015 pertaining to Non-Appointment of Company Secretary as the Compliance Officer .	BSE vide their letter No. LIST/COMP/532665/Reg.6 (1)-Mar-19/50/2019-20. dated 14-05-2019 have imposed a fine of Rs: 1,06,200/- (Including GST) for Non-compliance of the said regulations for the quarter ended 31 st March 2019.	Sri Anadish Srivastava. ACS-57126, has been appointed as the Company Secretary and Compliance Officer w e f 17-04-2019 in place of Attal Anand Kumar, ACS-A44309 who has resigned with effect from 23-03-2019

**For MARTHI & CO.
COMPANY SECRETARIES**


**S.S. MARTHI
COMPANY SECRETARY
F.C.S-1989 CP-1937**

MARTHI & CO

COMPANY SECRETARIES

2.	National Stock Exchange	<p>Non compliance of Regulation 6(1) of SEBI (LORD) Regulations, 2015 pertaining to Non-Appointment of Company Secretary as the Compliance Officer</p> <p>And</p> <p>Non compliance of Regulation 7(1) of SEBI (LORD) Regulations, 2015 pertaining to Non submission of Reconciliation of share capital audit report for the quarter ended 31st March 2019.</p>	<p>NSE vide their letter No.NSE/LIST-SOP/REG-6(1) & 7(1)FINES/81136 Dated 14-05-2019 have imposed a fine of Rs: 2,12,400/- (Including GST) for Non-compliance of the said regulations for the quarter ended 31st March 2019.</p>	<p>Sri Anadish Srivastava. ACS-57126, has been appointed as the Company Secretary and Compliance Officer w e f 17-04-2019 in place of Attal Anand Kumar, ACS-A44309 who has resigned with effect from 23-03-2019</p> <p>The report has been submitted on 6th May 2019 to the Stock Exchanges.</p>
----	-------------------------	--	---	--

For MARTHI & CO.
COMPANY SECRETARIES


S.S. MARTHI
COMPANY SECRETARY
F.C.S-1989 CP-1937

5

MARTHI & CO

COMPANY SECRETARIES

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 March 31, 2018.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
This being the first report since the notification of the requirement to submit this report, reporting on actions to comply with the observations made in the previous reports is not applicable.				

Place: Hyderabad
Date: 30-05-2019

For **MARTHI & CO.**
COMPANY SECRETARIES


S.S. MARTHI
COMPANY SECRETARY
F.C.S-1989 CP-1937