



SECRETARIAL COMPLIANCE REPORT OF RISHI TECHTEX LIMITED

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2022

I, Sudhanwa S. Kalamkar, Company Secretary in practice having Reg No: 7692 have examined:

- (a) all the documents and records made available to me, and explanation provided by **Rishi Techtex Limited** ("the Listed Entity"),
- (b) the filings/ submissions made by the Listed Entity to the stock exchange(s),
- (c) website of the Listed Entity,
- (d) other document(s)/ filings, as relevant, which has been relied upon to make this certification,

for the year ended **March 31, 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 during 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 during Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014. (Not Applicable during Review Period)



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008. (Not Applicable during Review Period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013. (Not Applicable during Review Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018
- (j) Clause 6(A) and 6 (B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, issued by the Securities and Exchange Board of India on Resignation of Statutory Auditors from listed Entities and their material subsidiaries. (Not Applicable during Review Period)

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	Submission of Annual Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 within 60 days of end of financial year 2020-21	The Annual Compliance Report was required to be filed within 60 days from the end of financial year 2020-2021 but the same was filed beyond the said period.	The Company filed Annual Compliance Report on 26-07-2021

- (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/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	The Bombay Stock Exchange	Delay in submission of Annual Compliance Report prescribed under Regulation 24A of SEBI LODR Regulations	Fine of Rs. 61360	As per clarification provided by the Company, although the Board in its' Meeting held on 28-06-2021, took note of the Annual Compliance Report, due to Covid induced lock-down conditions, the Company could not file the Report within stipulated time

(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

Place: Mumbai
Date: 25-05-2022

For Sudhanwa S Kalamkar & Associates,
Company Secretaries



Sudhanwa S Kalamkar
ACS: 18795 CoP: 7692

UDIN issued by the ICSI: A018795D000391112