



RAUNAQ EPC INTERNATIONAL LIMITED

(AN ISO 9001: 2008 Company)

REIL/SEC/BSE/4/MAY 2021-2022

May 20, 2021

The Manager (Listing)
BSE Limited
1st Floor, New Trading Ring
Rotunda Building
PJ Towers, Dalal Street
Fort, Mumbai – 400001

STOCK CODE: 537840

Sub: “Annual Secretarial Compliance Report” for the year ended March 31, 2021

Dear Sir/Madam,

Pursuant to Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019 issued by the Securities and Exchange Board of India (SEBI), please find enclosed herewith **“Annual Secretarial Compliance Report” for the year ended March 31, 2021** issued by M/s Etika Aggarwal & Associates, Practicing Company Secretaries, Delhi.

You are requested to take the same on your records.

Thanking you,

Yours faithfully
For **RAUNAQ EPC INTERNATIONAL LIMITED**

Kaushal Narula
Authorised Officer

Encl: As Above





ETIKA AGGARWAL AND ASSOCIATES

Company secretaries

SECRETARIAL COMPLIANCE REPORT OF RAUNAQ EPC INTERNATIONAL LIMITED (For the year ended 31st March, 2021)

To,
Raunaq EPC International Limited
20 K.M. Mathura Road
P.O. Box 353, P.O. Amar Nagar
Faridabad-121 003 (Haryana)

I, Etika Aggarwal, Proprietor of M/s Etika Aggarwal and Associates, Practising Company Secretaries have examined:

- all the documents and records made available to us and explanation provided by Raunaq EPC International Limited ("the Company"),
- the filings/submissions made by the Company to the stock exchanges,
- website of the Company,
- other document/filing, as may be relevant, which has been relied upon to make this certificate,

for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not applicable during the year under review.**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- Other Regulations as applicable and circulars/guidelines issued thereunder

And based on the above examination, I hereby report that, during the Review Period:

ETIKA
AGGARWAL
Digitally signed by
ETIKA AGGARWAL
Date: 2021.05.19
16:14:39 +05:30

Registered office: E-38, Second floor, Guru nanak road, Adarsh Nagar, Delhi-110033

Email :csetikaaggarwal@gmail.com, Mobile no.: +91-8368685731



- a) The Company 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
None			

- b) The Company 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 Company/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.	BSE Limited (BSE)	Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	<ul style="list-style-type: none"> Levy of fine Freezing of Promoter Shareholding for non payment of fine 	Instance of levy of fine occurred due to clerical error in filing the Reconciliation of Share Capital Audit Report for the quarter ended 30 th September, 2020 with BSE. However, in real terms the Company was not into any non-compliance of Regulation 6(1)(Listing Obligations and Disclosure Requirements) Regulations, 2015 and accordingly the Fine levied for the mentioned regulation had been waived by BSE and Promoter Shareholding had been unfreezed



				subsequently based on the corrected submissions/written representation made by the Company to BSE in regard to the said matter.
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- d) The Company 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 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Company
				Not Applicable

For ETIKA AGGARWAL & ASSOCIATES

Place: Delhi
Date: 17.05.2021

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Digitally signed
by ETIKA
AGGARWAL
Date: 2021.05.19
16:15:43 +0530'

ETIKA AGGARWAL
Proprietor
M No.:42749
CP No.:18788

