



# RAJ RAYON INDUSTRIES LIMITED

(A Government Recognised Star Export House)



Corporate Off. : 5C/196 & 197, AKSHAY MITTAL INDUSTRIAL ESTATE, SAKINAKA, ANDHERI (E), MUMBAI-400 059 (INDIA)  
☎ : +91 - 22 - 4034 3434 ● Fax : +91 - 22 - 4034 3400 ● E-mail : mumbai@rajrayon.com ● Website : www.rajrayon.com  
CIN NO. : L17120DN1993PLC000368

Date: 1/07/2021

<b>The Secretary</b> <b>BOMBAY STOCK EXCHANGE LIMITED</b> P J Towers Dalal Street, Fort, Mumbai 400 001	<b>NATIONAL STOCK EXCHANGE OF INDIA LIMITED</b> Listing Department Exchange Plaza, 5 <sup>th</sup> Floor, Bandra-kurla Complex, Bandra (East), Mumbai - 400 051.
<b>Company Code No. : 530699</b>	<b>Company Code : RAJRAYON</b>

**Sub: Secretarial Compliance Report for the Financial Year ended March 31, 2021**

**Dear Sir and Madam,**

In terms of Circular issued by the Securities and Exchange Board of India vide Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 please find enclosed herewith Secretarial Compliance Report for the Financial Year ended March 31, 2021 issued by the Secretarial Auditor of the Company Ms. Riddhi Shah, Practicing Company Secretary.

You are requested to kindly take the above information on record.

Thanking you,  
Yours faithfully,

**For RAJ RAYON INDUSTRIES LIMITED**

*Kanodia SN*

**(SUSHIL KUMAR KANODIA)**  
**CEO CFO**





**RiddhiKrunal Shah**  
**Practicing Company Secretary**

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A-1, KokilKunjCHSL., M. G. 'X' Road No. 4, Behind Patel Nagar,  
Near Vora Hospital, Kandivali (West), Mumbai - 400 067  
Mob: 9819988387 Email: [krassociates.cs@gmail.com](mailto:krassociates.cs@gmail.com)

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**Secretarial Compliance Report of RAJ RAYON INDUSTRIES LIMITED**  
*For The Financial Year Ended 31<sup>st</sup>March, 2021*

To  
The Members,  
RAJ RAYON INDUSTRIES LIMITED

I Riddhi Shah , Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **RAJ RAYON INDUSTRIES LIMITED (Resolution Professional )** ("the listed entity under Corporate Insolvency Resolution Process (CIRP)),

(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 2021 ("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 Company during the Audit Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



**RiddhiKrunal Shah**  
**Practicing Company Secretary**

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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- 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 Audit Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

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:-

<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
<i>Regulation 6(1) (Dec 2020) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer</i>	<i>Company is under Corporate Insolvency Resolution Process (CIRP) and not in a position to pay debt and appoint KMP CS</i>	<i>Fine impose of Rs 92000 by each exchange</i>
<i>Regulation 76 (Dec 2020) of SEBI (Depositories and Participants) Regulations, 2018 Non-submission of Reconciliation of share Capital audit Report.</i>	<i>Due to non -payment of fees of RTA and NSDL and CSDL, Company did not received the data and not filed the same on time</i>	<i>Remark from exchange non- submission</i>



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**Practicing Company Secretary**

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<i>Regulation 31 (March 2021) Non-submission of shareholding pattern within the period prescribed</i>	<i>Due to non -payment of fees of RTA and NSDL and CSDL, Company did not received the data and not filed the same on time</i>	<i>Fine impose Rs. 50000 by each exchange</i>
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(b)The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunderinsofaras 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 subsidiarieseither by SEBI or by Stock Exchanges (includingunder the Standard Operating Proceduresissued by SEBIthrough various circulars)under the aforesaid Acts/ Regulations and circulars/ guidelines issuedthereunder.

<b>Sr.No</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
1	<i>Penalty imposed by BSE and NSE</i>	<i>Late submission of Shareholding Pattern , Audit and appointment of CS</i>	<i>Fine of Rs. 142000/- by each exchange</i>	<i>Company is under Corporate Insolvency Resolution Process (CIRP) and not in a position to pay</i>
<i>NCLT has passed an order dated 23.01.2020 and appointed Mr. Abhishek Nagori as Insolvency Professional (IP). The IP has written a letter to SEBI, Exchanges, Depositories, RTA regarding wavier of fees and penalties. On confirmation and receipt of benpos and data from the depository and RTA , the Company has filed the compliances.</i>				

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



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**Practising Company Secretary**

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Sr.No	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
				<p>Trying do compliance on time but due to covid -19 management is not able to meet all the time line and make statutory payments on time.</p> <p>Further the Company is under Corporate Insolvency Resolution Process (CIRP) and NCLT has passed an order dated 23.01.2020 and appointed Mr. Abhishek Nagori as Insolvency Professional (IP) and under his instruction the company is functioning and filed the resolution program with NCLT</p>

*Abhishek Nagori*



**Riddhi Shah**  
**Practising Company Secretaries**  
**COP: 17035**  
**UDIN: A020168C000556825**  
**Place: Mumbai**  
**Date: 30/06/2021**

Note: Due to ongoing COVID19 pandemic and consequent lock-down imposed, I could not verify the compliance documents physically for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode