Riddhi Siddhi Gluco Biols Limited

Regd. Office : 10, Abhishree Corporate Park, Nr. Swagat Bungalow BRTS Bus Stand, Ambli-Bopal Road, Ambli, Ahmedabad-380 058. Phone : +91 2717 298600-602 & 297409 E-mail : ahmd@riddhisiddhi.co.in Website : www.riddhisiddhi.co.in CIN : L24110GJ1990PLC013967



30.05.2022

To, BSE Limited P.J. Towers Dalal Street, Fort Mumbai – 400 001

Scrip Code: 524480

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022: -

Dear Sir/Madam,

Pursuant to provisions of Regulation 24 A of Securities and Exchange Board of India (Listing Obligation and Disclosure) Regulations, 2015, we hereby submit Annual Secretarial Compliance Report issued by Mr. Kinjal Shah, Practicing Company Secretary, Ahmedabad for the Financial Year ended 31st March, 2022.

Kindly update the same on your records.

Thanking you,

FOR RIDDHI SIDDHI GLUCO BIOLS LIMITED

(Sharad Jain) Company Secretary Membership No. ACS 57221



Secretarial Compliance Report of RIDDHI SIDDHI GLUCO BIOLS LIMITED for the year ended 31st March, 2022

I, Kinjal Shah have examined:

- (a) all the documents and records made available to me and explanation provided by representative of RIDDHI SIDDHI GLUCO BIOLS LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31^{st} March, 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013;
- (f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (g) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021.

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



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(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, <u>except</u> in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		Nil	

- (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.	of the Practicing
1.	SEBI	SEBI has issued Order no. Order BD/2021-22/12448- 12453 dated July 2, 2021 and Order no. WTM / MB / IVD / ID12 / 12998 / 2021- 22 dated Augst 11, 2021 regarding alleged violation of Minimum Public Shareholding (MPS) and Unfair Trade Practices in the matter of delisting of the Company.	Order no. Order BD/2021-22/12448- 12453 dated July 2, 2021 Imposing penalty of Rs 5 Lakhs each on Company and 2 of its promoters Directors. Order No. WTM / MB / IVD / ID12 / 12998 / 2021-22 dated Augst 11, 2021 (a) Compliance with MPS requirement within 5 months	With respect to Order no. Order BD/2021- 22/12448-12453 dated July 2, 2021, the said order is challenged before Hon'ble Securities and Appellate Tribunal (SAT). However, the Company on directions of Hon'ble SAT has deposited penalty amount with SEBI. With respect to Order no. WTM / MB / IVD
			from order (11.8.21) and debarment	/ ID12 / 12998 / 2021-22 dated Augst

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			Company, its 2	11, 2021 the said order
à.	а в ^л	× * * *	promoters	is also challenged
		, in the	Directors and CFO	before Hon'ble
	S.	8 ₁₀	from accessing	Securities and
	8 a	ж	securities market with effect from	Appellate Tribunal (SAT) and Hon'ble SAT
1.0	A 550 A 10		below period:-	vide its order dated
	8 2		(b) The Company- one	28.10.2021 has stayed
4 a 17			year from date of	the effect and operation of the order passed by
8		μ	compliance of	Learned WTM of SEBI.
	20 20	*. *	MPS requirement. (c) 2 Promoter	
1 .			Directors- two	Pending both the orders with SAT, I can not
	x 2 59 1 x	a	years from date of	comment on the same.
	1		compliance of	
	· · · · · · · · · · · · · · · · · · ·		MPS requirement.	
			CFO- one year	4
	2		from date of order	1. The second
	19 A.		(11.08.2021)	

(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 on 31 st March, 2021 (The years are to be mentioned)		
1.	Nil	BSE has issued show cause by an e-mail on 10.08.2020 and imposed fine of Rs. 5,36,900/- and Rs. 3,48,100/- vide it's e- mail dated 20.08.2020 and 17.11.2020 for delay of 150 days in appointment of a Director while making compliance	submitted an application for waiver of fine on the ground of global pandemic situation created by COVID-19 with the stock exchange on 01.09.2020 and 24.11.2020 the BSE Ltd. vide it's e-mail	has waived the fine in this matter. Company has ensured the future compliance in this

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		of provisions of	has waived the fine	
	· · · · · · · · · · · · · · · · · · ·	Regulations 17(1)(C)	levied in this	
		of Securities and	matter.	
		Exchange Board of		
		India (Listing		
		Obligation and	×	
		Disclosure		
	13 NO	Requirements)		
	St. 1	Regulations, 2015		
	2 C C	regarding		8
		composition of		
	a ser a ser a ser	Board of Directors	and the second second	
		due to top 2000		
		listed companies		
2.	BSE Limited	SEBI has issued two	JAZ:11	II (11 CAT 11 1
۷.	vide it's notice		With respect to	Hon'ble SAT vide its
		Show Cause Notices	Order no. Order	order dated 28.10.2021
	no. 20181226- 29 dated 26 th	dated 20.12.2019 and 08.10.2020 and	BD/2021-	has stayed the effect
	Table - Contract - And - Martine	Contraction of the second s	22/12448-12453	and operation of the
	December, 2018 informed	issued final orders	dated July 2,	order passed by
		for both the matters	2021, the said	Learned WTM of SEBI
	that as per	on 02.07.2021 and	order is challenged	
	direction of	11.08.2021	before Hon'ble	Pending both the
	SEBI the	respectively issuing	Securities and	orders with SAT, I can
	delisting	following directions:	Appellate Tribunal	not comment on the
	process had	0.1	(SAT). However,	same.
	been kept on	Order no. Order	the Company on	
	hold, pending	BD/2021-22/12448-	directions of	
	inquiry.	12453 dated July 2,	Hon'ble SAT has	
- · · ·	a 24	<u>2021</u>	deposited penalty	
5 4		Imposing penalty of	amount with SEBI.	
		Rs 5 Lakhs each on	unount whitebebi.	
8 X.		Company and 2 of	With respect to	
		its promoters	With respect to	
		Directors.	Order no. WTM /	
1.5		5 A. A. S. A	MB / IVD / ID12	
	4. R	Order No. WTM /	/ 12998 / 2021-22	
v l		MB / IVD / ID12 /	dated Augst 11,	
	1	12998 / 2021-22	2021 the said order	
1.1	8.0	dated Augst 11, 2021	is also challenged	
	10	(a) Compliance	before Hon'ble	
N 8 - 1		with MPS	Securities and	
		requirement	Appellate Tribunal	
	1. 1.	within 5 months	(SAT) and Hon'ble	
2.01.		from order	SAT vide its order	

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debarment of Company, its 2 promoters Directors and CFO from accessing securities market with effect from below period:- (b) The Company- one year from date of compliance of MPS requirement. (c) 2 Promoter Directors- two years from date of compliance of MPS requirement.	has stayed the effect and operation of the order passed by Learned WTM of SEBI. Pending both the orders with SAT, I can not comment on the same.	
CFO- one year from date of order (11.08.2021)		

Place: Ahmedabad Date: 27th May, 2022

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Kinjal Shah Company Secretary in practice FCS No. 7417 C P No.: 21716 UDIN: F007417D000408400



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