

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



30.06.2021

To,
BSE Limited
P.J. Towers
Dalal Street, Fort
Mumbai - 400 001
Scrip Code: 500356

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2021: -

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, 2021.

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, 2021**

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 31st March, 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 (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;

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.	Company was required to have at least 6 six Directors on the Board as on 01.04.2020 being in top 2000 listed companies as per provisions of Regulations 17(1) of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.	Delay of 150 days in appointment of a Director while making compliance of provisions of Regulations 17(1)(C) of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.	<p>As per the provisions Regulation 17(1)(C) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018.</p> <p>The top 2000 listed entities were required to have not less than six Directors with effect from April 1, 2020.</p> <p>However, Company had only five Directors in it's Board as on 01.04.2020 and till the period 28.08.2020. Thus Company has made delay of 150 days in complying the above provisions.</p>

- (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.	BSE Ltd.	Delay of 150 days in appointment of a Director while making compliance of provisions of Regulations 17(1)(C) of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 regarding composition of Board of Directors due to top 2000 listed companies.	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 this non-compliance.	Company has 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 dated 16.04.2021 has waived the fine levied in this matter.
2.	SEBI	SEBI has issued Show Cause notice no. SEBI/HO/EAD/EAD7 /OW/P/2020/16763/1 dated October 8, 2020 under Rule 4 of Securities Contract (Regulations) procedure for holding Inquiry and Imposing Penalties) Rules, 1995 in the matter of trading by certain entities in the Script of the Company.	The Company has submitted the reply on November 5, 2020 to the said Show Cause Notice issued by SEBI denying the allegations contained in the said Show Cause Notice and submitted that Company has complied with requirement of applicable rules and regulations and Company is not in breach of any of it's obligations.	As the Company has submitted the reply on November 5, 2020 of Show Cause Notice issued by SEBI denying the allegations contained in the said Show Cause Notice and the final investigation is pending by SEBI, no comments on the subject matter can be offered at this stage.





(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, 2020 (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
1.	BSE Limited vide it's notice no. 20181226-29 dated 26 th December, 2018 informed that as per direction of SEBI the delisting process had been kept on hold, pending inquiry.	Securities Appellate Tribunal ("SAT") vide it's Order dated 21 st February, 2019 has noted the irregularities and those are being investigated by Securities and Exchange Board of India ("SEBI") and has directed SEBI to complete the investigation expeditiously.	As the SEBI is investigating this matter therefore listed entity is not required to take any action in this matter.	Pending final investigation by SEBI, I am not in a position to comment on the subject matter.

Place: Ahmedabad
Date: 30th June, 2021

Kinjal Shah



Kinjal Shah
Company Secretary in practice
FCS No. 7417
C P No.: 21716
UDIN: F007417C000554964

