



RAVI KUMAR DISTILLERIES LIMITED

Regd. Office : C-9, C-10, Industrial Estate, 2nd Main Road, Thattanchavady, Puducherry-605009.

Phone : 0413-2244007, 2248888, 2248887.

E-mail: cs@ravikumardistilleries.com, Website: www.ravikumardistilleries.com

CIN No.L51909PY1993PLC008493. GSTIN/UIN: 34AABCR4195D1ZJ.

May 29th, 2025

To Secretary Listing Department BSE Limited Department of Corporate Services Phiroze Jeejeebhoy Dalal Street, Mumbai – 400001 Scrip Code: 533294	To Secretary Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Mumbai – 400050. Scrip Code: RKDL
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Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2025

With reference to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find herewith Annual Secretarial Compliance Report dated 26th May, 2025 for the year ended March 31, 2025 issued by M/s. Uttam Shetty & Co, Company Secretaries (CP: 16861), Mumbai.

Thanking you,

Yours faithfully,

For **RAVI KUMAR DISTILLERIES LIMITED**

R.V. RAVIKUMAR
MANAGING DIRECTOR
DIN: 00336646



SECRETARIAL COMPLIANCE REPORT OF RAVI KUMAR DISTILLERIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2025.

We Uttam Shetty & Co, Practicing Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **RAVI KUMAR DISTILLERIES LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at **C-9, C-10, INDUSTRIAL ESTATE, 2ND MAIN ROAD, THATTANCHAVADY, PUDUCHERRY-605009**. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined:

- (a) all the documents and records made available to us and explanation provided by **RAVI KUMAR DISTILLERIES LIMITED** ("the listed entity") having CIN **L51909PY1993PLC008493**
- (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 period commencing from 1st April, 2024 to 31st March, 2025 ("**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 to the company during the 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 to the company during the review period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **(Not applicable to the company during the review period);**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the company during the review period);**
- g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not applicable during the 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) Regulations, 2018;
- j) All other regulations as applicable 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 in respect of matters stated in **annexure "A"** attached herewith:
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports stated in **annexure "B"** attached herewith:
- (c) Further, I/We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:



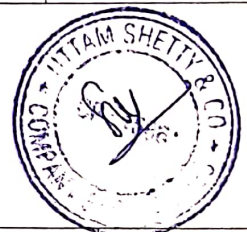


<u>Sr. No.</u>	<u>Particulars</u>	<u>Compliance Status</u> <u>(Yes/No/NA)</u>	<u>Observations/Remarks by PCS*</u>
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	YES	N.A.
2.	<u>Adoption and timely updation of the policies:</u> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI	YES	N.A.
3.	<u>Maintenance and disclosures on Website:</u> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website. • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes	N.A.
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	YES	N.A.
5.	<u>Details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	N.A.	The Company is not having any subsidiary
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	N.A.





7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	YES	N.A.
8.	<u>Related Party Transactions:</u> (i) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (ii) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	YES	N.A.
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	N.A.
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	N.A.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as disclosed in Annexure A	No	Company has not yet paid any amount of the penalty imposed by BSE and NSE
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	N.A.	Auditor of the company has not resigned during the audit period AND Company is not having any subsidiary






13.	<u>Additional Non-compliances, if any:</u>	Yes	N.A.
	No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.		

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Uttam Shetty & Co.
Company Secretaries
(PEER REVIEW CERT. NO :2224/2022)


Uttam Shetty
Proprietor
M. No.: F8691C.P. No.: 16861



UDIN: F008691G000445468

Place: Mumbai

Date : 26/05/2025

Annexure-A

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters stated below:

Sr. No.	Compliance Requirement (Regulations/ circulars including specific clause)	Regulation/ Circular No.	Deviation	Action Taken By	Type of action	Details of violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
1	Board shall have minimum number of directors as Six.	Reg. 17 of SEBI (LODR) 2015	Delay in appointment of minimum number of directors i.e. number of directors on the Board was less than six during the period from 26 th September, 2024 to 11 th November, 2024	BSE and NSE	Penalty	As disclosed in deviation column	Combined Penalty of Rs. 5,42,800/- (including GST)	Company failed to comply with Regulation 17(1) of SEBI (LODR), 2015 with regard to minimum number of directors. Further the Company failed to make payment within 15 days from the date of receipt of notice form Stock Exchange/s.	Mistake/Non-compliance is unintentional, caused inadvertently and on account of confusion due to separate list of top 2000 companies based on market capitalization available on BSE and NSE Website. Will take due care from next time onwards. Further, Company will take necessary steps to make the penalty payment at the earliest	NIL
2	Payment of listing fee to BSE and NSE for the financial year 2024-25	Reg. 14 of SEBI (LODR) 2015	Non-payment of Listing fees by the Company to BSE and NSE for the financial year 2024-2025.	N.A.	N.A.	As disclosed in deviation column	N.A.	Every year, Company is making delay/default in payment of listing fees.	Due to heavy losses and liquidity crises, company was unable to pay listing fees on time. However, listing fee of BSE/NSE for the year 2024-25 has been made on 13 th May 2025.	NIL



ANNEXURE "B"

The listed entity has taken the following actions to comply with the observations made in previous reports as follows

Sr. No	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Compliance (Regulations/circulars/ including specific clause	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Delay in submission of Declaration : Declaration submitted with BSE on 12 th May, 2023 and NSE on 12 th May 2023	31.03.2024	31(4) of SEBI (SAST) Regulations, 2015	Declaration as required under Regulation 31(4) of SEBI (SAST) regulations 2011 not submitted to stock exchanges before due date.	Now promoters are regular in submitting the required disclosure with stock exchanges.	N.A.
2	Delay in payment of listing fee BSE listing fee was paid 13/07/2023 and NSE listing fee was paid on 17/07/2023.	31.03.2024	14 of SEBI (LODR) Regulations, 2015	Delay in payment of Listing Fees by the Company to BSE and NSE for the financial year 2023-24	NIL	Every year Company is making delay/default in payment of listing fees
3	Delay in Submission of SCR: One day delay in submission of report for the year ended 31 st March, 2023	31.03.2024	Reg. 24(A) of SEBI (LODR) 2015	One day delay in Submission of report	Company is now regular in submitting annual secretarial compliance report.	N.A

