



Ranjit SECURITIES LTD.

Regd. Off. : 317-318, Transport Nagar, Scheme No. 44, Indore-14 (M.P.)
Phone : Off. : (0731)-4058447-4293747 Fax : 91 (0731) 2366558
CIN - L67120MP1994PLC008680

To,
The General Manager
Department of Corporate Services
Bombay Stock Exchange Ltd.
P.J. Towers, Dalal Street,
Fort, Mumbai- 400001

Date: 13/05/2022

SCRIP CODE: 531572, SCRIP SYMBOL- RANJITSE

SUBJECT: SECRETARIAL COMPLIANCE REPORT AS PER REGULATION 24A OF THE SEBI (LODR) REGULATIONS, 2015 FOR THE YEAR ENDED 31ST MARCH, 2022

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read alongwith CIR/CFD/CMD 1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mr. Gaurav Agrawal, Practicing Company Secretary for the financial year 2021 -22.

This is for the information of the exchange and the members.

So, kindly take the same in your record & acknowledge the same.

Thanking You

Yours Faithfully

For **Ranjit Securities Limited**
For RANJIT SECURITIES LIMITED

Compliance Officer & Company Secretary

Durga Ratnani

[Company Secretary cum Compliance Officer]



SECRETARIAL COMPLIANCE REPORT
OF RANJIT SECURITIES LIMITED FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2022

To,
The Members,
M/s. Ranjit Securities Limited,
317-318, Transport Nagar,
Scheme No. 44,
Indore (M.P.)

I have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by *M/s Ranjit Securities Limited* (hereinafter called "The Company"). Secretarial Audit was conducted in a manner that provided to me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit. I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2022 ('Audit Period') complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2022 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings (Not applicable to the Company during the Audit Period);
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'): –
 - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations 2011;
 - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 (Not applicable to the Company during the Audit Period);
 - (d) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 (Not applicable to the Company during the Audit Period);
 - (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not Applicable to the Company during the Audit Period);
 - (f) 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;
 - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not applicable to the Company during the Audit Period); and
 - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 (Not applicable to the Company during the Audit Period)
- (i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015
- (vi) The Company is a Non deposit taking Non-Banking Finance Company (NBFC) registered with Reserve Bank of India (RBI). Therefore, there are specific legal requirement applicable to the Company such as prudential norms by Reserve Bank of India issued by time to time regarding which the Company has complied with the following:





- (a) As reported by the management of the Company, there are quarterly and yearly compliances on XBRL portal Prescribed by RBI for these types of Companies. Hence we found documents regarding the same.
- (b) The Company has filed required forms with RBI related to annual compliances. The Company has submitted all the documents called by RBI time to time in a prescribed manner.
- (c) The Company declared that it has not accepted any deposit from public or any other during the audit period.

I have also examined compliance with the applicable clauses of the following:

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India w.e.f. October 1st, 2017
- (ii) The Listing Agreements entered into by the Company with Bombay Stock Exchange Ltd (BSE). July, 2015.
- (iii) SEBI (LODR) Regulations, 2015.

(iv) During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the observations,

Companies Act:-

1. A case has been filed before Chief Judicial Magistrate of Gwalior by the Registrar of the Companies, M.P. against the company and its directors under section 295(4) & (5), 211, 372(8), 209A and 383(1A) of Companies Act, 1956. The matter is still pending with ROC and Court.

SEBI & Listing Compliances:-

1. The Company's shares are suspended from trading at Bombay Stock Exchange Ltd. (BSE). However the Company has applied for Revocation of suspension of Share with BSE which is yet to be concluded. The Company has automatically delisted its trading from Madhya Pradesh Stock Exchange (MPSE) and Ahmadabad Stock Exchange (ASE) due to exit order issued by SEBI.

Other laws as per the Audit Reports:-

1. A case filed by Commercial Tax department is pending against the Company in MP High Court Bench, Indore. Liabilities under which amounting to Rs. 2, 31,104/-.
2. Demand of Rs. 13,770/- has been raised by Income Tax department as default on account of TDS deduction, interest on late payments, penalty for late filling U/s 234E for different past years, for which no provision has been made in books of accounts of the company. Details are as follows:

Name of the statute	Nature of dues	Period to which the amount relates	Amount due
Income Tax Department	On account of short payment, late filing fee and interest on late payment	FY 2013-14	1010/-
Income Tax Department	On account of short payment, late filing fee and interest on late payment	FY 2014-15	10600/-
Income Tax Department	On account of short payment, late filing fee and interest on late payment	FY 2015-16	1270/-
Income Tax Department	On account of short payment, late filing fee and interest on late payment	FY 2016-17	880/-
Income Tax Department	On account of short payment, late filing fee and interest on late payment	FY 2018-19	10/-

I further report that The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. There is a change in the composition of the Board of Directors and KMP that took place during the period as mentioned below:



Gaurav Agrawal, FCS
Practising Company Secretary



Gaurav Agrawal & Associates

COMPANY SECRETARY

3, Prakash Nagar, Near Navlakh Choraha, Indore

Email: agrawalassociates71@gmail.com

S.No.	Name of Director/KMP	Designation	Appointment/Resignation	Date of Appointment/Resignation
1.	Mr. Mohammad Akhtar	Independent Director	Appointment	13/08/2021

Adequate notice is given to all directors to schedule the Board Meetings and agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

All decisions at Board Meetings and Committee Meetings are carried out unanimously as recorded in the minutes of the meetings of the Board of Directors or Committee of the Board, as the case may be.

I further report that there are adequate systems and processes in the Company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that the compliance by the Company for the applicable Financial Laws like Direct Taxes, Indirect Taxes and the compliance of the Accounting Standards, quarterly financial results under Clause 41 of the Listing Agreement and/or Regulation 33 of SEBI (LODR) Regulations, 2015 and the annual financial statements, Cost Records have not been reviewed in this audit report, since the same have been subject to the statutory financial audit/cost audit by other designated professionals. This report is to be read with our letter of even date which is annexed as Annexure A and forms an integral part of this report.

I further report that during the audit period of the Company, there was no specific events/action other than mentioned above having a major bearing on the Company and Also laws, rules, regulations, guidelines, standards etc. referred to above.

Place: Indore
Date: 11/05/2022


CS Gaurav Agrawal
FCS No: 11498
CP No: 16822
UDIN-F011498D000304417

