

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 31st 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:

Kinjal Shah





- (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
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.	Observations/ remarks of the Practicing Company Secretary, if any.
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.	<u>Order no. Order BD/2021-22/12448-12453 dated July 2, 2021</u> Imposing penalty of Rs 5 Lakhs each on Company and 2 of its promoters Directors. <u>Order No. WTM / MB / IVD / ID12 / 12998 / 2021-22 dated Augst 11, 2021</u> (a) Compliance with MPS requirement within 5 months from order (11.8.21) and debarment of	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 / ID12 / 12998 / 2021-22 dated Augst

K. B. Shah






			<p>Company, its 2 promoters Directors and CFO from accessing securities market with effect from below period:-</p> <p>(b) The Company- one year from date of compliance of MPS requirement.</p> <p>(c) 2 Promoter Directors- two years from date of compliance of MPS requirement. CFO- one year from date of order (11.08.2021)</p>	<p>11, 2021 the said order is also challenged before Hon'ble Securities and Appellate Tribunal (SAT) and Hon'ble SAT vide its order dated 28.10.2021 has stayed the effect and operation of the order passed by Learned WTM of SEBI.</p> <p>Pending both the orders with SAT, I can not comment on the same.</p>
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(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)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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	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	The Stock Exchange has waived the fine in this matter. Company has ensured the future compliance in this matter.

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		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	has waived the fine levied in this matter.	
2.	BSE Limited vide its 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.	SEBI has issued two Show Cause Notices dated 20.12.2019 and 08.10.2020 and issued final orders for both the matters on 02.07.2021 and 11.08.2021 respectively issuing following directions: <u>Order no. Order BD/2021-22/12448-12453 dated July 2, 2021</u> Imposing penalty of Rs 5 Lakhs each on Company and 2 of its promoters Directors. <u>Order No. WTM / MB / IVD / ID12 / 12998 / 2021-22 dated Augst 11, 2021</u> (a) Compliance with MPS requirement within 5 months from order (11.8.21) and	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 / ID12 / 12998 / 2021-22 dated Augst 11, 2021 the said order is also challenged before Hon'ble Securities and Appellate Tribunal (SAT) and Hon'ble SAT vide its order dated 28.10.2021	Hon'ble SAT vide its order dated 28.10.2021 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.

K. B. Shah





		<p>debarment of Company, its 2 promoters Directors and CFO from accessing securities market with effect from below period:-</p> <p>(b) The Company- one year from date of compliance of MPS requirement.</p> <p>(c) 2 Promoter Directors- two years from date of compliance of MPS requirement.</p> <p>CFO- one year from date of order (11.08.2021)</p>	<p>has stayed the effect and operation of the order passed by Learned WTM of SEBI.</p> <p>Pending both the orders with SAT, I can not comment on the same.</p>	
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Place: Ahmedabad
Date: 27th May, 2022

J B Shah



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

