

# HEMANSHU KAPADIA & ASSOCIATES

COMPANY SECRETARIES

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## SECRETARIAL COMPLIANCE REPORT OF CRAVATEX LIMITED

CIN: L93010MH1951PLC008546

Ground Floor (East Wing), Forbes Building Charanjit Rai Marg, Fort, Mumbai - 400001

**For the Year Ended 31<sup>st</sup> March, 2021**

I, Hemanshu Kapadia, Proprietor of **Hemanshu Kapadia & Associates**, Practicing Company Secretaries, having Membership No. 3477 and COP No. 2285, have examined:

- (a) all the documents and records made available to us and explanation provided by **CRAVATEX LIMITED** ("the listed entity") having CIN:L93010MH1951PLC008546,
- (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 year ended 31<sup>st</sup> 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; **(Not Applicable to the Company during the Audit 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 Audit Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **(Not Applicable to the Company during the Audit Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **(Not Applicable to the Company during the Audit Period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **(Not Applicable to the Company during the Audit Period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And circulars/ guidelines issued thereunder applicable to the listed entity

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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.	Regulation 40 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015	Delay in dispatch of share certificate transmission, Name change and Name deletion	There was 1 request for 80 shares each for transmission of shares, Name Change and Name deletion which were dispatched beyond the time limit specified. As explained to us the above delays were due to current covid pandemic situation.

- (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.
<b>None</b>				

- (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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The consolidated financial statements for quarter ended 31/12/2019, submitted to BSE have been authenticated by the management and the auditors. However, the same needs to be signed by the designate person as provided under clause (b) of sub-regulation 2 of Regulation 33 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	March 31, 2020	The same has been complied with in future reports.	I concur
2.	The Company has made disclosure in relation to Sexual Harassment of Women at Workplace in Board's Report. However, it also needs to disclose the same under Corporate Governance as specified in Schedule V(C) Point 10(l) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	March 31, 2020	Sexual harassment details have been incorporated in Corporate Governance Report annexed with the Annual Report for the Financial year 2019-20.	The Company has given the necessary details in the specified format in the Corporate Governance Report for fy 2019-20.

3.	There was delay in issue of share certificate in 1 case pertaining to transfer for 55 shares and 1 case for change in name for 160 shares. As explained to us the above delays were due to heavy work load with RTA.	March 31, 2020	This delay was due to surge in volume of work load with the RTA.	The Company has instructed the RTA to be more diligent henceforth.
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For **Hemanshu Kapadia & Associates**  
Practicing Company Secretaries

**Hemanshu Kapadia**  
Proprietor  
Membership No.: F3477  
C. P. No.: 2285

UDIN: F003477C000525724

Place: Mumbai  
Date: June 28, 2021