

To  
BSE Limited  
P J Towers, Dalal Street,  
Mumbai-400001

Date: 30/05/2022

Dear Sir / Madam,

**Sub:** Submission of Secretarial Compliance Report for the year ended 31/03/2022.

**Ref:** 1) Dhanalaxmi Roto Spinners Limited

2) Scrip code: 521216

With reference to the subject cited above, please find attached the copy of Secretarial Compliance Report in compliance with the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31/03/2022.

This is for the information and records of the Exchange.

For **Dhanalaxmi Roto Spinners Limited**

*Pooja*

**Pooja Gadhia**  
**(Compliance Officer cum Company Secretary)**  
**(M.No. A61818)**





**Secretarial compliance report of Dhanalaxmi Roto Spinners Limited  
For the year ended 31<sup>st</sup> March 2022**

We Baheti Gupta and Co. have examined:

- (a) All the documents and records made available to us and explanation provided by Dhanalaxmi Roto Spinners Limited
- (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, 2022 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The 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 as the listed entity has not bought back /proposed to buy-back any of its securities during the Review Period];
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; [Not applicable as the listed entity has not offered any shares or granted any options pursuant to any employee benefit scheme during the Review Period];
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; [Not applicable as the listed entity has not offered any debt securities during the Review Period];
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; [Not applicable as the listed entity has not issued and listed any Non-Convertible and Redeemable Preference Shares during the Review Period];
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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 specified below:

Sr.No	Compliance Requirement(Regulations/ circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Nil	Nil	Nil	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 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.
Nil	Nil	Nil	Nil	Nil

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: NOT APPLICABLE

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (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

For Baheti Gupta & Co.,  
Company Secretaries

Shailesh Baheti  
(Shailesh Baheti)  
(M. No:8159)  
(CP No.9017)

Place: Hyderabad  
Date: 30/08/2021  
UDIN: F0081591D00043D295

