



**RASI ELECTRODES LTD.,**



Ref:REL/ 053 /2021-22  
June 30, 2021

To,  
Department of Corporate Services  
THE STOCK EXCHANGE, MUMBAI,  
PHIROZE JEEJEEBHOY TOWERS  
DALAL STREET  
MUMBAI-400001

\\SCRIP CODE: 531233\\

Dear Sir,

Sub:: Annual Secretarial Compliance Report Issued by a Practicing Company Secretary for the year ended 31st March, 2021, as per requirements of Reg.24A of SEBI (LODR) Regulations, 2015.

We are sending herewith Annual Secretarial Compliance Report issued by a Practicing Company Secretary for the year ended 31st March, 2021, as per requirements of Reg.24A of SEBI (LODR) Regulations, 2015.

We request you to take the above on record and acknowledge.

This letter and the annexures are being filed through the online listing portal at [www.listing.bseindia.com](http://www.listing.bseindia.com) through the User ID issued to the Company.

Thanking You,

Yours faithfully,  
for RASI ELECTRODES LIMITED,

  
B POPATLAL KOTHARI  
MANAGING DIRECTOR  
DIN: 000594168

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Manufacturers & Marketers of Welding Electrodes and Consumables

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Regd. Off : 21, Raja Annamalai Rd, Flat No. A/14, Rams Apartment, 3rd Floor, Chennai - 600 084, Ph : +91-44-26424523 / 7884, Fax : 91-44-42027464 Email : info@rasielectrodes.com  
Visit us : [www.rasielectrodes.com](http://www.rasielectrodes.com) Factory : Upparapalayam Village, Alamathi Post, Redhills, Chennai - 52. Ph : +91-44-26310511, 26310512, 9381023215

CIN : L52599TN1994PLC026980, Customer Care : +91-044-26401822

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF  
M/s. RASI ELECTRODES LIMITED  
FOR THE YEAR ENDING 31<sup>ST</sup> MARCH 2021**

[Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015, read along with Circular No.  
CIR/CFD/CMD1/27/2019 dated February 08, 2019 Issued by  
Securities and Exchange Board of India]

I, **GOPIKRISHNAN MADANAGOPAL**, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **M/s RASI ELECTRODES LIMITED [CIN: L52599TN1994PLC026980]** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to BSE LIMITED [the stock exchange where its Equity shares are listed],
- (c) website of the listed entity ([www.rasielectrodes.com](http://www.rasielectrodes.com)),
- (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 & Disclosure Requirements) Regulations, 2018 – **Not applicable as there were no reportable events during the financial year under review;**



(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 as there were no reportable events during the financial year under review;**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable as there were no reportable events during the financial year under review;**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable as there were no reportable events during the financial year under review;**

(g) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013 - **Not applicable as there were no reportable events during the financial year under review;**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018;

(j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

and circulars/ guidelines issued thereunder and based on the above examination, 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:-

Sno.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 39 of the SEBI (LODR) Regulations, 2015. BSE Limited has initiated process for assessment of compliance with Regulation 39(4) read along with Schedule VI of SEBI (LODR) Regulations, 2015, by the Company and its RTA.	The Company has allotted shares pursuant to split of Equity shares of Rs.10 each into 5 Equity shares of Rs.2 each on 11 <sup>th</sup> April 2015 and issued	The Company and its RTA has initiated action to comply on receipt of communication from BSE Ltd during the year. The Company has identified the 68 Folios of returned unclaimed



		<p>share certificates.</p> <p>The share Certificates sent to about 68 Folios have returned undelivered and lying unclaimed till date. As per the amended provisions of Regulation 39 of SEBI (LODR) Regulations, 2015, which came into effect subsequent to conclusion of the split event, the unclaimed shares will have to be transferred to a separate single folio and subsequently transferred to Demat Suspense Account to be opened with a Depository by following due process prescribed under the said regulation.</p>	<p>share certificates and issued three reminders to the shareholders at their registered addresses. However, the shares are still remaining unclaimed.</p> <p>The Company has, on 22<sup>nd</sup> March 2021, in order to comply with the requirements of Regulation 39, have transferred the shares into a separate single folio and dematerialisation of the shares to unclaimed shares suspense account have been initiated and is in progress.</p>
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(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:

Sno.	Action taken by	Details of violations	Details of action take.e.g.Fines, warning letter, debarment, etc.	Observations/ Remarks of the Practicing Company Secretary, if any
1.	NIL	NIL	NIL	NIL



  
 20 JUN 2021

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sno.	Observations of Practicing Company Secretary in the previous reports	Observations made in Secretarial Compliance Report for the year ended...	Action taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on action taken by the Listed Entity
1.	Not applicable	Not applicable	Not applicable	Not applicable

Signature :   
Name : GOPIKRISHNAN MADANAGOPAL  
Membership No. : FCS-2276  
C.P.No. : 2051  
UDIN : F002276C000549130  
Place : CHENNAI  
Date : 30<sup>TH</sup> JUNE 2021



  
30<sup>TH</sup> Jun 2021