

29th May 2022

To,

Listing Department BSE Limited 25 th Floor, P. J. Towers, Dalal Street, Mumbai - 400 001. Scrip Code: 505368	Listing Department National Stock Exchange of India Limited Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra East, Mumbai - 400 051. Scrip Code: REVATHI
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Dear Sir / Madam,

**Sub: Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulation,
2015 for the financial year ended 31st March 2022**

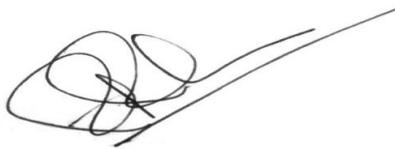
Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith a copy of the duly signed Secretarial Compliance Report received from MDS & Associates, Company Secretaries for the financial year ended 31st March 2022.

This is for your information and records.

Thanking You,

Sincerely,

For Revathi Equipment Limited



Nishant Ramakrishnan

Company Secretary and Compliance Officer

Encl: Secretarial Compliance Report from MDS & Associates, Company Secretaries

Revathi Equipment Limited

331, Pollachi Road, Coimbatore - 641 050. India. Phone : 0422 - 2610851, 0422 - 6655100, Fax :
0422 - 6655199 CIN No.: L29120TZ1977PLC000780 E-mail: finance@revathi.in Website:

www.revathi.in



MDS & Associates

Company Secretaries in Practice

M.D. Selvaraj M Com MBA FCS

"SURYA", 35, Mayflower Avenue, Sowripalayam Road, Coimbatore 641028.

Phone : 0422-2318780, 2316755, Fax : 0422-2314792, E-mail : mds@mdsassociates.in, Web : www.mdsservices.in

**Secretarial Compliance Report of M/s. Revathi Equipment Limited
for the year ended 31st March 2022**

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019]

I, **M D Selvaraj (FCS 960 / CP.No.411)** of **M/s. MDS & Associates, Company Secretaries**, have examined:

- all the documents and records made available to us and explanation provided by **M/s.Revathi Equipment Limited** (CIN: L29120TZ1977PLC000780) ("the listed entity"),
- the filings/ submissions made by the listed entity to BSE Limited and National Stock Exchange of India Limited ("the stock exchanges"),
- website of the listed entity
- any 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:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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 as applicable to the listed entity, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 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:-

S. No.	Compliance Requirement (Regulation/Circulars/ Guidelines including specific clause)	Deviation	Observations/Remarks
1.	Regulation 17(1)(c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 stipulates that the Board of Directors of top 2000 listed entities shall comprise of not less than six directors with effect from 1 st April 2020.	The Board comprised of only five (5) directors instead of six (6) directors for the period from 01.04.2021 to 17.06.2021	The Company has appointed Mr.P.Gandhimadhinathan as a Non-Executive Non-Independent Director with effect from 18 th June 2021. Accordingly, the composition of Board was not in compliance with Regulation 17(1)(c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the period from 01.04.2021 to 17.06.2021

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- c) There were no 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.
- d) The listed entity has taken the following actions to comply with the observations made in previous reports.



S. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
1.	The Company has appointed Mr.Harivansh Dalmia as a Non-Executive Non-Independent Director with effect from 15 th June 2020. Accordingly, the composition of Board was not in compliance with Regulation 17(1)(c) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the period from 01.04.2020 to 14.06.2020	The Board comprised of only five (5) directors instead of six (6) directors for the period from 01.04.2020 to 14.06.2020	The Company has appointed Mr.Harivansh Dalmia as a Non-Executive Non-Independent Director with effect from 15 th June 2020.	The Board composition was corrected with the appointment of Mr.Harivansh Dalmia as a Non-Executive Non-Independent Director with effect from 15 th June 2020.

e) There was no event of appointment/re-appointment/resignation of statutory auditor of the listed entity during the period under review. Further, the terms of appointment of its existing statutory auditor are in compliance of Para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated 18th October 2019 issued by Securities and Exchange Board of India.

Place : Coimbatore

Date : 24/05/2022

M. D. Selvaraj

M D Selvaraj

MDS & Associates

Company Secretaries

FCS. No: 960; CP. No: 411

UDIN: F000960D000361155

Peer Review No. 985/2020

