

**SANJAY DAYALJI KUKADIA**  
**(Practicing Company Secretary),**  
**Address: Flat number-101, Block Number-J,**  
**Swaminarayan Castle-2, Near Aatmiya Sanskardham School,**  
**Arjun Ashram Road, Chandlodiya (Nirnaynagar),**  
**Ahmedabad-382481, GUJARAT, INDIA, Mobile-7043427903**  
**Email id:kukadiasanjay1974@gmail.com**  
**PAN (PERMANENT ACCOUNT NUMBER) -AMQPK0051R**

---

**SECRETARIAL COMPLIANCE REPORT OF ROBERT RESOURCES LIMITED**  
**FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

To,  
The Board of Directors  
**ROBERT RESOURCES LIMITED**  
L99999GJ1982PLC096012  
3<sup>rd</sup> Floor, Plot No. 1067, Opp. Bindu Nivas, Kaliyabid Road,  
Bhavnagar – 364 001

I have examined:

- (a) all the documents and records made available to us through scanned copies by email and explanation provided by Robert Resources Limited (“the listed entity”),
- (b) the filings/submissions made by the listed entity to the Metropolitan Stock Exchange of India Limited and Calcutta Stock Exchange Limited,
- (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 (“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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 review period);**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, to the extent applicable; **(Not Applicable to the company during the review period)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not Applicable to listed entity during review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to listed entity during review period);**

**SANJAY DAYALJI KUKADIA**  
**(Practicing Company Secretary),**  
**Address: Flat number-101, Block Number-J,**  
**Swaminarayan Castle-2, Near Aatmiya Sanskardham School,**  
**Arjun Ashram Road, Chandlodiya (Nirnaynagar),**  
**Ahmedabad-382481, GUJARAT, INDIA, Mobile-7043427903**  
**Email id:kukadiasanjay1974@gmail.com**  
**PAN (PERMANENT ACCOUNT NUMBER) NUMBER-AMQPK0051R**

---

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to listed entity during review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to listed entity during review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 to the extent applicable;
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, to the extent applicable;
- (j) The Depositories Act, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable,

and circulars/ guidelines issued there under; and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued expect the following:
- There has been a delay of one day in intimating the Stock Exchange for conducting the Board Meeting for approval of financial Result for the quarter ended 30<sup>th</sup> June, 2021, as required in terms of regulation 29 of SEBI (LODR), Regulations, 2015. The fine was levied has been duly paid by the Company.
  - The Company being a promoter of Econo Trade India Limited has purchased 4,33,988 Equity Shares of Econo Trade India Limited during the trading window closure period. Suo Moto intimation of the said purchase of shares is already intimated by the Company.
- (b) The listed entity has generally maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.
- (c) As per the details given by the Management, no other action has been taken against the Company / 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 there under than those stated below:

**SANJAY DAYALJI KUKADIA**  
**(Practicing Company Secretary),**  
**Address: Flat number-101, Block Number-J,**  
**Swaminarayan Castle-2, Near Aatmiya Sanskardham School,**  
**Arjun Ashram Road, Chandlodiya (Nirnaynagar),**  
**Ahmedabad-382481, GUJARAT, INDIA, Mobile-7043427903**  
**Email id:kukadiasanjay1974@gmail.com**  
**PAN (PERMANENT ACCOUNT NUMBER) NUMBER-AMQPK0051R**

Sr. No.	Action Taken by Stock Exchange	Details of Violation	Details of action Taken	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Metropolitan Stock Exchange of India Limited (MSEI)	Non-compliance of Reg. 29 (2)/29 (3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	In terms of the Circular no. SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 read with SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/2020/48 dated March 26, 2020 ("SEBI SOP Circular") issued by SEBI with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") and Standard Operating Procedure for suspension. Company has been directed to pay INR 11,800/- as a penalty for one day delay in intimating to the Stock Exchange for conducting Board meeting for approval of Financial Result for quarter ended June, 2021.	The company has paid INR 11,800/- as penalty through NEFT Ref No. 640460952 on 23 <sup>rd</sup> October, 2021.

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

Sr. No.	Action Taken by	Details of Violation	Details of action Taken by listed company
1.	Metropolitan Stock Exchange of India Limited (MSEI)	Non-Appointment of Company Secretary and Compliance officer under Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Company appointed Company Secretary and Compliance officer under Regulation 6 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

2.	Metropolitan Stock Exchange of India Limited (MSEI)	Non-compliance with disclosure of related party transactions on consolidated basis	Company by virtue of declaration dated 9 <sup>th</sup> February, 2021 supported by a certificate from the statutory auditor of the company of even date, confirmed that there are no related party transactions in the Company and hence compliance by way of reporting as required under regulation 23(8) of Listing Regulations is required to be done. The said penalty was eventually waived by MSEI.
----	---	--	---

Note: The securities of the Company are also listed on The Calcutta Stock Exchange Limited, however the current status is suspended. The company has taken necessary steps for revocation of the suspension from The Calcutta Stock Exchange Limited.

Further, the Company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.

**For, SANJAY DAYALJI KUKADIA  
Company Secretaries**

**Place : Ahmedabad  
Date : 18<sup>th</sup> May,2022**

**[SANJAY DAYALJI KUKADIA]  
PROPRIETOR  
Membership Number:A20674  
Certificate of Practice Number:11308.  
UDIN;A020674D000344151  
PEER REVIEW NUMBER-1429/2021 DATED 11<sup>TH</sup> AUGUST,2021**