

# REAL TOUCH FINANCE LIMITED

(FORMERLY : ASSOCIATED CEREALS LIMITED)

CIN : L01111WB1997PLC085164

Date:-21-06-2019

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

**Ref: Scrip Code: 538611.**

**Subject : Annual Secretarial Compliance Report of the Company for the Year ended 31.03.2019**

**Ref: SEBI Circular CIR/CFD/CMDI127/2019 dated 08.02.2019**

Dear Sir,

With reference to the above circular, please find the attached scanned copy of the Annual Secretarial Compliance Report for the year ended 31.03.2019.

Kindly take the aforesaid information in your records.

Please acknowledge the same.

Thanking You,

Yours Faithfully

For, Real Touch Finance Limited,

*Abinandan Laha.*

CFO



**ANNUAL SECRETARIAL COMPLIANCE REPORT**

**Secretarial Compliance Report Of Real touch Finance Limited For The year Ended March 31,2019**

I. have examined:

(a) all the documents and records made available to us and explanation provided by **REAL TOUCH FINANCE LIMITED**( "the listed entity").

(b) the filings submissions made by the listed entity to the stock exchange(s).

(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 March 31, 2019 ("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 / guide lines 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 during the review 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 during the review period**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not applicable during the review period**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:- **Not applicable during the review period**





**DIPTI DAMANI**  
Practicing Company Secretary

71/3, Canal Circular Road  
Prasad Exotica, Block 5 3B, Kolkata: 700054  
Mob: +91 9836157419  
Email Id: diptirandar@gmail.com

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;- **Not applicable during the review period**

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

(i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993: - **Not applicable during the review period**

(j) Securities and Exchange Board of India (Intermediaries) Regulations, 2008;- **Not applicable during the review period**

(k) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company 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 there under, to the extent applicable and in the manner prescribed, except in respect of matters specified below:

Sr No.	Compliance Requirement (Regulations/Circulars guidelines including specific clause)	Deviations	Observation/ Remarks of the Practicing Company Secretary, if any.
1	Regulation 55A of SEBI (LODR) Regulation, 2018	Discrepancies in Reconciliation of Share Capital Audit Report for the quarter ended 30-09-2018 and 31-12-2018.	Company has complied in due course

(b) The listed entity has maintained proper records under; the provisions of the above Regulations and circulars / guidelines issued there under 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 there under:

Sr.NO	Action Taken By	Detail of Violation	Detail of Action taken e.g fines, warning letter, debarment	Observation/ Remarks of the Practicing Company Secretary, if any.
1	BSE LIMITED	Regulation-33 of the SEBI (LODR) Regulations 2015 -	Levied Monetary Fine	Company has complied in due course and penalty





**DIPTI DAMANI**

Practicing Company Secretary

71/3, Canal Circular Road

Prasad Exotica, Block 5 3B, Kolkata: 700054

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Email Id: diptirandar@gmail.com

		Non-submission of the Financial result within period prescribed under the regulation		has been paid
2	BSE LIMITED	Regulation - 13(3) Statement of Investors Complaint	Levied Monetary Fine	Company has complied in due course and penalty has been paid

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

Sr.NO	Observation of the Practicing Company Secretary, in the previous report	Observations made in the secretarial compliance report for the year ended ..... (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NOT APPLICABLE		

Place: Kolkata

Date: May 30, 2019



*Dipti Damani*  
Dipti Damani

Practicing Company Secretary

Membership No. 53996

COP No. 20083