

REAL TOUCH FINANCE LIMITED

(FORMERLY : ASSOCIATED CEREALS LIMITED)

CIN : L01111WB1997PLC085164

Date:- 29-04-2022

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 31.03.2022

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 31.03.2022.

Kindly take the aforesaid information in your records.

Please acknowledge the same.

Thanking You,

Yours Faithfully

For Real Touch Finance Limited

Priyanka Singh

Priyanka Singh
Company Secretary



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

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial Compliance Report Of Real Touch Finance Limited For The Financial year Ended March 31, 2022
(Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 8, 2019)

I, Dipti Damani Practicing Company Secretary have examined:

- (a) All the documents and records made available to us and explanation provided by **REAL TOUCH FINANCE LIMITED** ("the listed entity/Company"),
- (b) The filings/submissions made by the listed entity to the BSE (Bombay Stock Exchange) Limited (the Stock Exchange where its Equity Shares are listed),
- (c) The website of the listed entity (<http://www.realtouchfinance.com>)
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 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 / 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 to the listed entity during the 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 to the listed entity during the year under review**):
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;- (**Not applicable to the listed entity during the year under review**):





DIPTI DAMANI

Practicing Company Secretary

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(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;- (**Not applicable to the listed entity during the year under review**):

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;- (**Not applicable to the listed entity during the year under review**):

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

(i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018:

(j) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company:

Based on the above examination, we hereby report that, during the Period under Review:

(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,
	NOT APPLICABLE		

(b) The listed entity has maintained proper records under; the provisions of the above Regulations and circulars / guidelines issued there under in so far 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,
	NOT APPLICABLE			





DIPTI DAMANI

Practicing Company Secretary

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(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 31.03.2022	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NOT APPLICABLE		



Dipti Damani

Dipti Damani

Practicing Company Secretary

Membership No. 53996

COP No. 20083

Place: Kolkata

Date: 28/04/22

UDIN: A053996 D00 022555 2