ROLLATAINERS
EMERGING EVERYDAY

ROLLATAINERS LIMITED

Registered Office: Plot No. 73-74, Phase-III, Industrial Area, Dharuhera, District Rewari, Haryana-123106
Tel.: 01274-243326, 242220
E-mail: cs.rollatainers@gmail.com **Website:** www.rollatainers.in
CIN: L21014HR1968PLC004844

Ref.No.: RTL/BSE/NSE/2025-26 **Date: May 28,2025**

To

The Secretary **BSE Limited** **Phiroze Jeejeebhoy, Towers Limited** **Dalal Street, Mumbai - 4000 01**	**The Secretary** **National Stock Exchange Limited** **Exchange Plaza** **Bandra Kurla Complex** **Bandra (E)** **Mumbai - 400 051**
Scrip Code: 502448	**Symbol: ROLLT**

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2025

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated 8th February 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. Sachin Khurana, Proprietor of M/s S. Khurana & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2025.

This is for your information and records.

Thanking You,
Yours faithfully,

For Rollatainers Limited

ADITI JAIN Digitally signed by ADITI JAIN
Date: 2025.05.28 17:07:02 +05'30'

Aditi Jain
(Company Secretary and Compliance Officer)

Enclosed: As stated

SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2025

To,
The Board of Directors
ROLLATAINERS LIMITED
CIN: L21014HR1968PLC004844
Plot No. 73-74, Phase- III, Industrial Area,
Dharuhera, District- Rewari, Haryana, India, 123106

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **ROLLATAINERS LIMITED, CIN - L21014HR1968PLC004844** (hereinafter referred as 'the listed entity'), having its Registered Office at **Plot No. 73-74, Phase- III, Industrial Area, Dharuhera, District- Rewari, Haryana, India, 123106**. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on **March 31, 2025**, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I**, Sachin Khurana**, Companies Secretaries, have examined:

a) all the documents and records made available to us and explanation provided by the listed entity,
b) the filings/submissions made by the listed entity to the stock exchanges,
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 financial year ended **March 31, 2025** ("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 ("SEBI LODR Regulations, 2015");
b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **[Not applicable as the listed entity has not issued any further share capital 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 (Buy-back of Securities) Regulations, 2018 **[Not applicable as the listed entity has not issued any further share capital during the Review Period]**;
e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not applicable as the listed entity has not issued any further share capital during the Review Period];**
f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 [**Not applicable as the listed entity has not issued any Non-Convertible Securities during the Review Period]**;
g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
h) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/guidelines issued thereunder.

and based on the above examination, we hereby report that, during the Review Period:

I. (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: -

Sr. No	Compliance Requirement (Regulations/ Circulars/ guideline including specific clause)	Regulation/ Circular Number	Deviation	Action taken by	Type of Action	Details of Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/ Warning	Fine (INR)	Observations/ Remarks of the Practicing Company Secretary	Management Response to Violation/ Clarification/ Advisory/Fine/ Show Cause Notice/Warning	Remarks
1	Annual Secretarial Compliance Report	Regulation 24(A)	Delay by 15 days	BSE	Fine	Delayed submission of PDF by 15 days	Rs. 35,400/-	Annual Secretarial Compliance Report (PDF) was submitted to stock exchange by delay of 15 days	Fines of Rs. 35400 was imposed by BSE and paid by company on August 31,2024.	-
2	Transfer or transmission or transposition of securities	Regulation 40(9) & (10)	Delay by 1 day	No action taken	No action taken	Delayed submission of PDF by 1 days	No action taken	Intimation to stock exchange was made with a delay of 1 day	Management is following strict timely compliance	As confirmed by the management of the Company, no action was taken by regulator

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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2024	Compliance Requirement (Regulations/circulars / guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Incomplete composition of Nomination and Remuneration Committee	Fine of Rs. 45,078/- was imposed by the stock exchange and the same was paid by the Company	Regulation 19(1)/19(2)	Incomplete composition	Company requested NSE for rework of CG for quarter ended June 30, 2024	Fine of Rs. 45,078/- was paid by the Company on May 10, 2024

(c) We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/Remarks by PCS
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013.	Yes	However, the Company is advised to follow SS in stricter manner.
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	- -
3.	**Maintenance and disclosures on Website:** • The listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes Yes Yes	The listed entity is maintaining a functional website and as confirmed by the management, information under the separate section was disseminated within the time

4.	**Disqualification of Director(s):** None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	-
5.	**Details related to Subsidiaries of listed entities have been examined with regard to:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	-
6.	**Preservation of Documents:** The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI LODR Regulations 2015.	Yes	-
8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes Not Applicable	- The listed entity has obtained the prior approval of Audit Committee for related party transactions, if required under the applicable law.

9.	**Disclosure of events or information:** The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	-
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and Circulars/Guidelines issued thereunder.	No	No action has been taken by the SEBI against the listed entity. However, Action taken by Stock Exchange(s) is provided in detail in table (a) of this report.
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries** The listed entity has complied with paragraph 6.1 and 6.2 of Section V-D of chapter V of "Master Circular on compliance with the provisions of SEBI LODR Regulations, 2015 by listed entities" and that they have incorporated all the terms and conditions in the engagement letter issued to the auditors of the Company	**NA**	During the reporting period, Statutory Auditors have not resigned.

13	**Additional non-compliances, if any:** No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	**No**	Details of all non-compliances is reported in table (a) of this report.

We further confirm that the disclosure of Employee Benefit Scheme Documents, as provided in terms of Regulation 46(2)(za) of the SEBI LODR Regulations, 2015 read with Para 11 of the SEBI Circular No. SEBI/HO/CFD/CFD-PoD2/CIR/P/2024/185 dated December 31, 2024, is not applicable on the listed entity during the Review Period.

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For S. Khurana & Associates
Company Secretaries
FRN: I2014DE1158200
Peer Review No. 804/2020

SACHIN KHURANA
Digitally signed by SACHIN KHURANA
Date: 2025.05.28 00:43:46 +05'30'

Sachin Khurana
Proprietor
M. No.: F10098; CP No.:13212
UDIN - F010098G000463584
Date: May 28, 2025 |Place: New Delhi