

RARE EQUITY PRIVATE LIMITED

151, 15th Floor, Nariman Bhavan, Nariman Point, Mumbai-400021

CIN: U74110MH1993PTC074456 | www.rareequity.net | Contact No: 022 4004 8766/022 6659 0100 | rareequity@rareenterprises.net

May 30, 2024

BSE Limited

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai- 400001

Scrip Code: 973302 & 973303

Subject: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024

Dear Sir/ Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulation 2015, please find enclosed herewith Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024.

Kindly take the same on record.

For Rare Equity Private Limited,

Vrushali
Deshpand
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Digitally signed by Vrushali Deshpande
DN: c=IN, o=Personal, postalCode=400063,
s=Mumbai Suburban, st=Maharashtra, street=801
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WALTHAM ROAD, Mumbai, Maharashtra India-
400063, GOREGAON East, title=1281,
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b3ce74752a4dbcc8cd71e7aa6c9f,
serialNumber=aaefc1d9712d9c6fb3776db125
b4fd100138148d9056f8889f9db99042,
email=deshpandevrushali9@gmail.com,
cn=Vrushali Deshpande
Date: 2014.05.30 11:05:49 +05'30'

Vrushali Deshpande

Executive Director

DIN: 05216743

Encl: As above



Company Secretary in Practice
Membership: ACS 47040
Certificate of Practice: 17217
Peer Review : 2773/2022

DIVYA MOHTA
29, Strand Road, Kolkata - 700001
Mobile : 9830971919
Email : dmohta92@gmail.com

SECRETARIAL COMPLIANCE REPORT
OF
RARE EQUITY PRIVATE LIMITED
FOR THE YEAR ENDED MARCH 31, 2024

I, Divya Mohta, Company Secretary in whole time practice; have examined:

- a. All the documents and records made available to me, and explanation provided by **M/s. Rare Equity Private Limited ('the Listed Entity')**,
- b. The filings/ submissions made by the Listed Entity to the Bombay Stock Exchange,
- c. Website of the Listed Entity and
- d. Any other documents/ filings, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2024 ('Review Period') in respect of compliance with the provisions of:
 - I. The Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, circulars, guidelines issued thereunder; and
 - II. 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: -

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
2. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not Applicable to the Listed Entity)**;
3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 **(Not Applicable to the Listed Entity)**;
4. The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(Not Applicable to the Listed Entity)**;
5. The Securities and Exchange Board of India (Shared Based Employee Benefits and Sweat Equity) Regulations, 2021 **(Not Applicable to the Listed Entity)**;



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6. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
7. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to the Listed Entity);**
8. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
9. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client **(Not applicable as the Listed Entity is not registered as Registrar & Transfer Agent);**

I ~~Am~~ 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 and mandatorily applicable.	Yes	NIL
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of the Board of Directors of the Listed Entity.All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the Regulations/Circulars/ Guidelines issued by SEBI.	Yes	NIL
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">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 redirects to the relevant document(s)/ section of the website.	Yes	NIL



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Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observations / Remarks by PCS*
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL
5.	Details related to Subsidiaries of Listed Entities have been examined w.r.t.: <ul style="list-style-type: none"> Identification of material subsidiary Companies Disclosure requirement of material as well as other subsidiaries 	NA	The listed Entity does not have any Subsidiary Companies
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	NIL
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/during the financial year as prescribed in SEBI Regulations.	Yes	NIL
8.	Related Party Transactions: <ol style="list-style-type: none"> The Listed Entity has obtained prior approval of Audit Committee for all related party transactions; or 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. 	NA	The listed Entity has not entered into any Related Party Transactions
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.	NA	The said Regulation 30 is not applicable to Listed Entity. However, it has made the



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Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observations / Remarks by PCS*
			Disclosures as per Regulation 51(1) & (2) wherever required.
10.	Prohibition of Insider Trading: The Listed Entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NIL
11.	Actions taken by SEBI or Stock Exchange(s), if any: Following action has been taken against the Listed Entity 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: Bombay Stock Exchange (BSE), vide its Email dated December 15, 2023, levied a fine of Rs. 37,000/- for Non-Disclosure of few line items in accordance with Regulation 52(4) of the SEBI (LODR) Reg. 2015 w.r.t. Financial Results for the Quarter/Half year ended September 30, 2023.	Yes	Necessary Compliance has been done by the Listed Entity by payment of fine amounting to Rs. 37,000 and the same has been noted in the Board Meeting dated February 14, 2024.
12.	Additional Non-compliances, if any: No additional non-compliance observed for all SEBI Regulation/ Circular/Guidance notes etc.	Yes	NIL



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Compliances related to resignation of Statutory Auditors from listed entities ~~and their material subsidiaries~~ as per SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019- **Not Applicable.**

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: -

Sr . No	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
1	Disclosure of line items in accordance with Regulation 52(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 w.r.t. Quarter/Half year ended September 30, 2023	Regulation 52(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	-	Bombay Stock Exchange (BSE)	Fine	Non-Disclosure of few line items in accordance with said regulation in the Financial Results for the Quarter/Half year ended September 30, 2023.	37,000	-	-	Necessary Compliance has been done by the Listed Entity by payment of fine amounting to Rs. 37,000 and the same has been noted in the Board Meeting dated February 14, 2024.



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- (b) The Listed Entity has taken the following actions to comply with the observations made in previous reports:

Sr. No	Compliance Requirement (Regulations/ Circulars / Guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine amount	Observations/ Remarks of the Practicing Company Secretary	Management response	Remarks
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NIL

DIVYA MOHTA Digitally signed
by DIVYA MOHTA
Date: 2024.05.24
16:55:26 +05'30'

Divya Mohta
Practising CS
Membership No. : A47040
COP No. : 17217
Peer Review No. : 2773/2022

Kolkata | 23rd May 2024

UDIN : A047040F000428179

Note: This report is to be read with our letter of even date which is annexed herewith and forms an integral part of this report.