

Date: August 5, 2024

BSE Limited

Department of Corporate Services
Pheroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

National Stock Exchange of India Limited

Exchange Plaza, 5th Floor,
Plot No. C/1, G Block
Bandra- Kurla Complex, Mumbai-400051

SCRIP Code- 544136

ISIN: INE0NQ801033

SYMBOL-RKSWAMY

Sub: Intimation under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, this is to inform you that an administrative warning letter dated August 05, 2024 ("said letter"), has been issued by Securities and Exchange Board of India ("SEBI") – pointing out that certain statements published in an Article by Business India Magazine in online and print media that were extraneous to the Draft Red Herring Prospectus ("DRHP") filed by the Company dated August 11, 2023, thereby violating the publicity guidelines laid down under SEBI (Issue of Capital and Disclosure Requirements) Regulations 2018. The copy of the said letter is attached herewith.

Background: An article titled "The Marketing Maaestro" was published by Business India Magazine in the online and print versions of their issue dated November 27, 2023, to December 10, 2023, edition. This article written and published by Business India contained certain details regarding the business of the Company, past track record, future prospects etc. which were extraneous to the DRHP filed by the Company.

Business India magazine at the request of the Company redacted the statements from the online sources of the said Magazine publications. However, they published the corrigendum to the original article on June 10, 2024, to June 23, 2024, edition of the magazine in print media, instead of the immediate subsequent edition of the magazine.

The SEBI through the said letter has warned the Company to be careful in future and to avoid recurrence of such instances failing which action may be initiated in accordance with the provisions of SEBI Act, 1992.

There is no impact on financial, operation or other activities of the Company pursuant to the said letter issued by SEBI. . The Company stands committed to highest standards of compliance.

The said letter was received by the Company through email on August 05, 2024, at 04.46 PM

Kindly take the above information on record.

For R K Swamy Limited

Aparna Bhat
Compliance Officer

Membership No.: A19995

Address: Esplanade House, 29, Hazarimal Somani Marg,
Fort, Mumbai 400 001

Place: Mumbai

R K SWAMY LIMITED

Formerly known as "R K Swamy Private Limited"

Esplanade House.

29 Hazarimal Somani Marg,

Fort, Mumbai 400 001.

Phone +9122 4057 6399,2207 7476

www.rkswamy.com

CIN No. L74300TN1973PLC006304

Regd Office 19 Wheatcrofts Road,
Nungambakkam, Chennai 600 034.

Offices also at Bengaluru. Hyderabad.
Kochi, Kolkata, New Delhi.



Deputy General Manager
Corporation Finance Department
Division of Supervision, Enforcement & Complaints - 3
email: atula@sebi.gov.in

By Courier and E-mail

SEBI/HO/CFD/SEC-3/OW/P/2024/24903/1
August 05, 2024

To,
R K Swamy Ltd
No.19, Wheatcrofts Road,
Nungambakkam, Chennai,
Tamil Nadu-600034
Tel No: 022-4057 6499

Kind Attention: Mr. Srinivasan K Swamy, MD

**Subject: Administrative Warning letter for non-compliance of
SEBI(ICDR) Regulations, 2018**

Sir/Madam,

1. This has reference to the Draft Red Herring Prospectus filed by R K Swamy Limited dated August 11, 2023.
2. In this regard, it was noted that an article titled "The Marketing Maaestro" was published in the Business India Magazine in the November 27, 2023 to December 10, 2023 edition.
3. The said article *inter-alia* contained certain details regarding the business of the company, its past track record, future prospects etc which were found to be extraneous to the information provided in the DRHP filed by the company

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with SEBI. This was despite the fact that the LM had at multiple instances advised the company regarding the publicity guidelines and restrictions.

4. Subsequently, it was submitted to SEBI that Business India magazine had been requested by R K Swamy Limited to issue a corrigendum in respect of certain statements in its next issuance, along with removal of the same from online sources of the Article.
5. During the course of examination it was found that though the statements had been redacted from the online sources of publication, the corrigendum was not published in the print media as committed by the company to SEBI.
6. Accordingly, the following issues were noted in the instant matter:
 - 6.1. Despite regular advise by the legal counsel and the merchant bankers, the company made certain statements that were extraneous to the DRHP in its interactions with the media which was in violation of the publicity guidelines laid down under Clause 1(b) and Clause 5 of Schedule IX of SEBI(ICDR) Regulations, 2018.
 - 6.2. The subsequent edition of Business India Magazine did not contain the required corrigendum as committed by the company to SEBI and it got listed on the stock exchange on March 12, 2023.
 - 6.3. Based on the aforementioned paragraphs, it can be observed that the company was constantly being informed regarding the need to follow the publicity guidelines. While the statements extraneous to the DRHP had been removed from the online sources of the article, the corrigendum was not published in the subsequent edition of the magazine in print media.

7. Accordingly, it can be seen that the company has been negligent at various instances thereby violating Clause 1(b) and Clause 5 of Schedule IX of SEBI(ICDR) Regulations, 2018.
8. The above violation has been viewed very seriously. You are therefore, **warned** to be careful in future and improve your compliance standards to avoid recurrence of such instances, failing which action may be initiated in accordance with the provisions of SEBI Act, 1992 and the Rules and Regulations framed thereunder.
9. Further, you are advised to:
 - (a) Place this communication, findings of the examination and corrective actions taken by you to rectify the deficiency before your Board of Directors in their next meeting.
 - (b) Take this letter into consideration for performance appraisal of the concerned individual(s) who is/are responsible for the lapse/deficiency mentioned in the letter.
 - (c) Immediately disclose this letter in the "Corporate Announcement" section on the website of the stock exchange where the shares of the company are listed.

Yours faithfully,


Atul Agarwal



Copy to-

1. NSE(Via email)
2. BSE(Via email)