

BHAGWATI AUTOCAST LIMITED

June 12, 2021

To, BSE Limited Mumbai

Security Code: 504646

Dear Sir,

Sub.: Annual Secretarial Compliance Report for the financial year 2020-21

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular Number CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company issued by Company Secretary in Practice for the financial year ended March 31, 2021.

The aforementioned report will also available on the website of the Company at www.bhagwati.com.

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Kindly take it on record and acknowledge the receipt.

Thanking you.

Yours faithfully, For, **Bhagwati Autocast Limited**

Mehul Naliyadhara

Company Secretary & Compliance Officer

Encl.: A/a.



CHIRAG SHAH & ASSOCIATES

Company Secretaries 1213, Ganesh Glory, Nr. Jagatpur Crossing, Besides Ganesh Genesis,

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SECRETARIAL COMPLIANCE REPORT OF BHAGWATI AUTOCAST LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

To,

Bhagwati Autocast Limited Survey No. 816, Village Rajoda, Nr. Bavla Ahmedabad – 382220

We, Chirag Shah and Associates, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Bhagwati Autocast Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity i.e. www.bhagwati.com,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31**st **March, 2021** ("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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

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 thereunder, except in respect of matters specified below:
- Not Applicable

Sr. No	Compliance Requirement	Deviations	Observations/	
	(Regulations/ circulars /		Remarks of the	
	guidelines including specific		Practicing Company	
15 91	clause)		Secretary	

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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 thereunder: - Not Applicable

Sr. No.	Action taken by	Details	of	Details of action	Observations/
		violation		taken E.g. fines,	remarks of the
á				warning letter,	Practicing
3	*			debarment, etc.	Company
				=	Secretary, if any.
					,



(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable.**

Sr.	Observations of	Observations made A	Actions taken by	Comments of the
No.	the Practicing	in the secretarial th	he listed entity,	Practicing Company
	Company Secretary	compliance report if	f any	Secretary on the
	in the previous	for the year ended		actions taken by the
* a	reports	(The years are to be		listed entity
		mentioned)		4
2 2				
			*	

I, further, report that there was no event of appointment/ re-appointment/ resignation of statutory auditor of the Company during the review period and the Company has modified the terms of appointment of its existing auditor. In this regard, I report that the Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18,2019.

For, Chirag Shah and Associates
Practising Company Secretary

Place: Ahmedabad Date: 11/06/2021

Raimeen Maradiya

Partner

Membership No. ACS 43050

C P No. 17554

UDIN: A043050C000449511