

BIHAR SPONGE IRON LIMITED

REGISTERED OFFICE & PLANT : UMESH NAGAR, CHANDIL-832401, DISTT. SARAIKELA - KHARSAWAN, JHARKHAND
PHONE (EPABX) : 06591-232410, 232417, Fax : 06591-232413
E-mail : bsilchandil@gmail.com / Web : bsil.org.in CIN : L27106JH1982PLC001633

29.06.2021

To
The Manager
The BSE Limited
25th Floor, P.J. Towers,
Dalal Street
Mumbai-400001

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Scrip Code: 500058

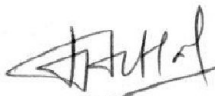
Dear Sir,

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with **SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019**, Please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March 2021, issued by Ms. Soniya Gupta, Proprietor of M/s Soniya Gupta & Associates, Practicing Company Secretaries.

Kindly take the same in your records.

Thanking you,

For BIHAR SPONGE IRON LIMITED



Himani Mittal
Company Secretary & Compliance Officer

Encl: as above



SONIYA GUPTA & ASSOCIATES
PRACTICING COMPANY SECRETARIES

Secretarial Compliance Report
of
BIHAR SPONGE IRON LIMITED

(For the year ended on 31.03.2021)

To,
The Board of Directors
BIHAR SPONGE IRON LIMITED
Umesh Nagar, Chandil,
Dist. Saraikela Kharsawan
Pin - 832 401

We have examined:

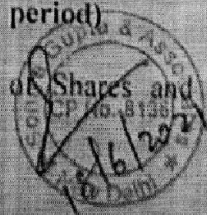
- a) all the documents and records made available to us and explanation provided by BIHAR SPONGE IRON LIMITED ("Listed Entity").
- b) the filings/submissions made by the listed entity to the stock exchanges.
- c) website of the listed entity,
- d) any other document /filing, as may be relevant, which has been relied upon to make this certification.

For the year ended on 31.03.2021 ("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, a amended from time to time 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 review period)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:-



Off: 135, LGF, S S Plaza, Palam Dabri Road, Mahavir Enclave, New Delhi - 110045
M.No: 9811287070, email id: sonyaes@gmail.com,

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;- (Not applicable to the listed entity during the review period)

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;- (Not applicable to the listed entity during the review period)

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

(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 review period)

(h) Securities and Exchange Board of India (Prohibition of Insider Training) Regulations, 2015;

(i) 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 review period);

(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; - (Not applicable to the listed entity during the review period).

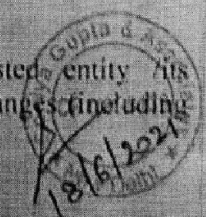
Circular/guidelines issued thereunder and based on the above examination, we hereby report that, during the Review Period:

(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:-

| Sr. No. | Compliance Requirement (Regulation s/Circulars/Guidelines including specific clause) | Deviation | Observations /remark of the Company Secretary, if any |
|---------|---|---|--|
| 1. | As per the Cir/ISD/3/2011, the shareholding of promoters and group of promoters to be 100% in dematerialized form | The shareholding of promoters and group of promoters to be 100% in dematerialized only to the extent of 56.27% share as on 31.03.2021 | The Company has intimated the promoters to get the shares dematerialised, the same is in process. 32500300 shares held in the name of Moderate Leasing and Capital Services Limited are pledged. |

(b) The Listed Entity has maintained proper records under the provisions of the above Regulations and Circulars /Guidelines issued thereunder 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 Exchange including



under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/Regulations and circulars / guidelines issued thereunder

| Sr. No. | Action Taken By | Details of Violation | Details of action taken e.g. Fines, Warning Letters, and debarment etc. | Observations /remark of the Company Secretary, if any |
|---------|-----------------|----------------------|---|---|
| NIL | | | | |

d) The listed entity has taken the following actions to comply with the observations made in the previous report:

| Sr. No. | Observation of the practicing Company Secretary in the previous reports | Observations made in the Secretarial Compliance Report for the year ended 31.03.2020 | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
| 1. | As per the examination of records and information made available to us, the company has not maintained the structured digital database as on the date of signing the report for the previous year 2019-20. | As specified in column 2 of this table. | The company has maintained the software for digitisation of the database of the Company for the F.Y 2020-21. | The company has maintained the software for digitisation of the database of the Company for the F.Y 2020-21. |

For Soniya Gupta & Associates

Company Secretaries

Soniya Gupta

Proprietor

M. NO. 7493

CP NO. 8136

Place: NEW DELHI

Date: 18/06/2021

UDIN: F007493C000483980