



BEDMUTHA INDUSTRIES LIMITED

CIN - L 31200MH1990PLC057863

MANUFACTURER & EXPORTER OF

★ ALL TYPES OF GALVANISED WIRES & BLACK WIRES



★ ACSR CORE WIRES

★ CABLE ARMOURING WIRE & STRIPS

★ STAY WIRES & EARTH WIRES

★ M.S. & H.B. WIRES

★ SPRING STEEL WIRES

★ ROLLING QUALITY WIRES

★ P.C. WIRE & P.C. STRAND WIRES

★ ROPE WIRES

★ BARBED WIRE

★ CHAIN LINK FENCINGS

★ WIRE NAILS

★ BINDING WIRES

Date: 30/07/2020

To,

BSE Limited

Department of Corporate Services,
Phiroj Jeejibhoy Towers, Dalal Street
Mumbai – 400 001.

Scrip Code: 533270

To,

National Stock Exchange of India Limited

Listing Department,
C-1, G- Block, Bandra-Kurla Complex
Bandra (E), Mumbai – 400 051,

Scrip Symbol: BEDMUTHA

Dear Sir/ Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2019-20

Kindly find enclosed herewith Annual Secretarial Compliance Report for the Financial Year 2019-20 in terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

Please take the same on your records.

Thanking you,

For and on behalf of

BEDMUTHA INDUSTRIE LIMITED

AJAY TOPALE

Company Secretary and Compliance Officer

Membership no.: A26935

ENCL:

1. Annual Secretarial Compliance Report for the Financial Year 2019-20.

Regd. Office : Plot No. A-31 to 35 & 57, Sinnar-Shirdi Road, STICE, Musalgaon, Sinnar, Dist. Nashik Ph. 02551-240320, 240481, Fax - 240482

Corporate Office : B-301/302, Sai Classic, Off. Palm Acres, Gavanpada Mulund (E) Mumbai. Ph.: (022) 21634422, 21637674/75, Fax : 022-21631667

Works : Plant -1, Plot No. A-31 to 35 & 57, Sinnar-Shirdi Road, STICE, Musalgaon, Sinnar, Dist. Nashik Ph.: 02551-240069, Fax - 240482

Plant -2, Plot No. A-70,71,72, Sinnar-Shirdi Road, STICE, Musalgaon, Sinnar, Dist. Nashik Ph.: 02551-240420, Fax - 240482

Plant -3, Plot No. B-113, Sinnar-Shirdi Road, STICE, Musalgaon, Sinnar, Dist. Nashik Ph.: 02551-240367, Fax - 240482

Plant -4, Plot No. B-140, Sinnar-Shirdi Road, STICE, Musalgaon, Sinnar, Dist. Nashik Ph.: 02551-240068, Fax - 240482

Plant -6, Plot No.E-1, MIDC Nardana, Phase - II, Waghadi - Khurd, Tal - Shindkheda, Dist - Dhule Ph.: 02562 - 262625

E-mail Sinnar :- bwcl.sales@bedmutha.com

Mumbai :- bedmuthawires@rediffmail.com

Web :- www.bedmutha.com

Secretarial Compliance Report of Bedmutha Industries Limited for the year ended March 31, 2020

{Pursuant to Regulation 3 (b) of the SEBI Circular No CIR / CFD/CMD1/ 27 / 2019 dated February 08, 2019 under SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015}

We, M/s. S. Anantha & Ved LLP, Company Secretaries, Mumbai have examined:

- (a) all the documents and records made available to us and explanation provided by **Bedmutha Industries** Limited having CIN L31200MH1990PLC057863 (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, (website address: <http://www.bedmutha.com/>);
- (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, 2020 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** for the year under review);
- (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** for the year under review);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and the Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 (**Not Applicable** for the year under review);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not Applicable** for the year under review);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not Applicable** for the year under review);

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

(i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder

and based on the above examination, we hereby report that, during the financial year ended March 31, 2020:

(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) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|---------|--|---|--|
| 1. | Regulation 34 read with Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 | <p>Following Disclosures/Reports were not included in the annual report submitted by the Company for the financial year ended March 31, 2019:</p> <ol style="list-style-type: none"> 1. Detail of fees paid to the statutory auditor and all entities in the network firm/network entity of which the statutory auditor is a part; and 2. Certificate from a Company Secretary in practice that none of the Directors on the Board of the Company have been debarred or disqualified from being appointed or continuing as Directors of Companies. <p><i>(The Company has received an e-mail from NSE on April 03, 2020 in this regard)</i></p> | The Company has submitted its reply on April 03, 2020, undertaking to forward the required disclosure / Reports and no further clarification was sought by NSE in this regard. |

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| 2. | Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 | <p>Company has not filed the Statement on Impact of Audit Qualifications (for audit report with modified opinion) for the Consolidated Financial Results submitted with the Stock Exchanges for the quarter and year ended March 31, 2019, approved at the Board Meeting held on May 28,2019.</p> <p><i>(The Company has received a letter from NSE on June 06, 2019 in this regard)</i></p> | <p>In response to the NSE letter dated June 06, 2019, the Company has filed the Statement on Impact of Audit Qualifications (for audit report with modified opinion) for the Consolidated Financial Results for the quarter and year ended March 31, 2019 on June 17, 2019.</p> |
|----|---|--|---|

(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 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:

| Sr. No. | Action taken by | Details of violation | Details of action taken e.g. fines, warning letter, debarment, etc. | Observations/ remarks of the Practicing Company Secretary, if any. |
|-----------------------|-----------------|----------------------|---|--|
| Not Applicable | | | | |

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

| Sr. No. | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended <i>(The years are to be mentioned)</i> | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|-----------------------|--|---|--|--|
| Not Applicable | | | | |

For S. Anantha & Ved LLP
Company Secretaries



Sachin Sharma
Designated Partner
ACS: A46900
CP No.: 20423
UDIN: A046900B000528843

Place: Jodhpur
Date: 30th July, 2020