

June 25, 2021

**BSE Limited** Corporate Relationship Department 1st Floor, P. J Towers, Dalal Street, Mumbai 400 001

Code No. 505827

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2021

Dear Sir/Madam,

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

We request you to kindly take the above on record.

Thanking you,

Yours truly,

For SNL BEARINGS LIMITED

Kamlesh Sondigala **Company Secretary** 

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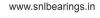
Encl: as above



Dhannur, 15, Sir P. M. Road, Fort, Mumbai - 400 001

022-22663698









Company Secretary

504, Navkar, Nandapatkar Road. Vile Parle East, Mumbai - 400 057.

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## SECRETARIAL COMPLIANCE REPORT OF **SNL BEARINGS LIMITED** FOR THE YEAR ENDED 31.03.2021

## I have examined:

- (a) All the documents and records made available to me and explanation provided by SNL Bearings Limited ("the 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 31st 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 - [Not Applicable since there was no reportable event during 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 since there was no reportable event during the year under review];



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 [Not Applicable since there was no reportable event during the year under review];
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)
  Regulations, 2008 [Not Applicable since there was no reportable event during 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 since there was no reportable event during the year under review];
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and

circulars/ guidelines issued thereunder;

and 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 matter specified below:

Sr. No:	Compliance Requirement (Regulations/Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1)	Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015 – The Board of Directors of the top 2000 listed entities (with effect from April 1, 2020) shall comprise of not less than six directors.	Mr. Jayavardhan Dhar Diwan (Independent Director) w.e.f. from 08th February, 2021, the total strength of	complied with Regulation 17(1)(c) of the SEBI (LODR) Regulations by appointing Mr. Kaiyomarz Minoo Marfatia as an Additional Director in the

(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 my examination of those records.



- (c) 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 my examination of those records.
- (d) 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		
		- NIL	-	

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

Sr. No.	Observations of	Observations	Actions tak	en Comments of the
	the Practicing	75	by the list	
	Company	secretarial	entity, if any	Secretary on the
	Secretary in the	compliance		actions taken by the
	previous reports	report for the		listed entity
		year ended		
		(The years are to		
		be mentioned)		

Not Applicable since no action was required to be taken by the listed entity

UDIN: F002727C000401092

Place: MUMBAI Date: 31/05/2021

(UPENDRA C. SHUKLA) COMPANY SECRETARY FCS: 2727/CP No: 1654