



## SNL BEARINGS LIMITED

June 25, 2021

BSE Limited  
Corporate Relationship Department  
1<sup>st</sup> 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**

Encl: as above

REGISTERED



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



022-22663698



022-2266 0412/ 9850



[www.snlbearings.in](http://www.snlbearings.in)



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WORKS



Ratu, Ranchi - 835 222



0651-2521876



0651-2521920

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 31<sup>st</sup> 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];**



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- (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.	On the resignation of Mr. Jayavardhan Dhar Diwan (Independent Director) w.e.f. from 08th February, 2021, the total strength of the Board of Directors was reduced to 5 (five).	The Company has complied with Regulation 17(1)(c) of the SEBI (LODR) Regulations by appointing Mr. Kaiyomarz Minoos Marfatia as an Additional Director in the Category of Non-Executive & Independent Director w.e.f. May 31, 2021 within the time prescribed under Regulation 25(6) of SEBI (LODR) Regulations, 2015

- (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.

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- (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	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
- NIL -				

- (e) 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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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