



Shivalik Bimetal Controls Ltd.

(A Govt. of India Recognised Star Export House)

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Secretarial / Investor Department : investor@shivalikbimetals.com
CIN : L27101HP1984PLC005862



SBCL/BSE/2022-23/ 13

30th May, 2022

To, BSE Limited Corporate Relationship Deptt. PJ Towers, 25th Floor, Dalal Street, Mumbai – 400 001 Code No. 513097	To, National Stock Exchange of India Ltd. Exchange Plaza, Plot No.C/1, G-Block Bandra Kurla Complex, Bandra (East), Mumbai – 400 051 Code No. SBCL
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Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclose herewith a copy of Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2022, issued by M/s R Miglani & Co., Practicing Company Secretaries.

Please take the aforesaid information on record.

Thanking you,

For Shivalik Bimetal Controls Limited

Aarti Sahni
Company Secretary & Compliance Officer

Encl: As above



**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
SHIVALIK BIMETAL CONTROLS LIMITED
(For the year ended 31st March, 2022)**

I, Rajni Miglani Proprietor of R Miglani & Co, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **Shivalik Bimetal Controls 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, 2022 (“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) Regulation, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; ***Not Applicable for the period 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 period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable for the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable for the period 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 period under review**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;
- (j) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

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 matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 24A of SEBI (LODR) Regulation, 2015 Annual Secretarial Compliance report	The Company has submitted the secretarial compliance report for the financial year ended 31 st March, 2021, after stipulated period of 60 days.	The Company has now made due compliance of said Regulation by filing the same with the stock exchange (BSE & NSE) on 05 th July, 2021.
2	Pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	One of Company's Designation Person has violated Clause 9 (iv) of the Company's code of conduct by Execution of Contra Trade.	The Audit Committee & Board of Directors of the Company imposed a fine after considering the explanation furnished by the Designated Person regarding inadvertently purchase & sale of shares.

			<p>Further the Audit Committee & Board of Directors also considered the quantum of shares involved and it being the first instance of non-compliance of Code of Conduct by the Designated Person.</p> <p>The Audit Committee and Board of Directors of the Company also issued a warning to take utmost care in future to avoid further stringent action.</p>
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- (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 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.
	None			

(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.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

For **R MIGLANI & CO.**
Practicing Company Secretary



Signature: _____

Name of the Practicing Company Secretary: **CS Rajni Miglani**

ACS No.: **30016**

C P No.: **11273**

Place: New Delhi

Date: 16th May, 2022

UDIN:- A030016D000325905