

BWRL/2021-22/SE/QC/006**Date: June 28, 2021**

To,

National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E),
Mumbai – 400051
NSE Symbol - BHARATWIRE

BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001
BSE Scrip Code: 539799

Dear Sir/Madam,

Subject: Submission of Annual Secretarial Compliance Report for Financial year 2020-2021

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended), read along with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by M/s. Mihen Halani and Associates, Practicing Company Secretaries for the financial year 2020-2021.

Kindly take the same on your records.

For **Bharat Wire Ropes Limited**

Murarilal Mittal
Managing Director
DIN: 00010689

Encl.: As above**Corporate Office:**

A - 701, Trade World Bldg., Kamala Mills,
SB Marg, Lower Parel (W),
Mumbai - 400013, Maharashtra, India.
Tel: +91 22 66824600

Factory:

Plot No-1&4, Atgaon Industrial Complex,
Mumbai-Nasik Highway, Atgaon (East),
Taluka-Shahpur, Dist.-Thane- 421601,
Maharashtra, India.
Tel No.: +91 2527 240123/240124/240197

Registered Office & Factory:

Plot No.4, MIDC, Chalisgaon,
Village Khadki – BK, Taluka Chalisgaon,
District Jalgaon - 424 101,
Maharashtra, India



MIHEN HALANI & ASSOCIATES

Practicing Company Secretaries

A-501L, Jaswanti Allied Business Centre, Next to Khwaish Hotel, Kanch Pada,
Ramchandra Lane Extension Road, Malad (West), Mumbai – 400 064,

☎: 022 – 6236 0279, ✉: mcihenhalani@gmail.com

**Annual Secretarial Compliance Report of Bharat Wire Ropes Limited
For the year ended March 31, 2021**

To,
The Board of Directors,
Bharat Wire Ropes Limited
CIN: L27200MH1986PLC040468
BSE Scrip Code: 539799/ ISIN: INE316L01019

We, M/s. Mihen Halani & Associates, have examined:

- a) all the documents and records made available to me and explanation provided by Bharat Wire Ropes 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 March 31, 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not Applicable during the period under review;**
- g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 - **Not Applicable during the period under review;**
- i) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable during the period under review;**
- j) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not Applicable during the period under review;**
- k) Other Rules and Regulations and the circulars/ guidelines issued thereunder;
 - SEBI (Depositories and Participants) Regulations, 2018;

Based on the above examination, we hereby report that, during the Review Period:

- i. The listed entity has complied with all the provisions of the above Regulations and circulars/guidelines issued thereunder:

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Not Applicable		

- ii. 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.
- iii. No 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 letters, debarments, etc.	Observation/ remarks of the Practicing Company Secretary, if any.
1.	Not Applicable			

- iv. The listed entity has taken the following actions to comply with 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company has not taken prior approval of Audit Committee for related party transactions	F.Y. 2019-20	The Company duly obtained all the necessary approvals from the Board as required under the provisions of SEBI (LODR) Regulations, 2015 as well as the Companies Act, 2013 respectively. The audit committee was duly informed about the said transactions which were in arms-length price and in ordinary course of business. Further, the Company has also ratified all such transactions at 34 th Annual General Meeting.	N.A.

For MIHEN HALANI & ASSOCIATES
Practicing Company Secretary

Date: 05.06.2021
Place: Mumbai
UDIN: F009926C000423878

MIHEN
HALANI
Mihen Halani
(Proprietor)
CP No: 12015
FCS No: 9926

Digitally signed by MIHEN HALANI
DN: cn=MIHEN HALANI, o=MIHEN HALANI & ASSOCIATES, ou=Practicing Company Secretaries, email=mihen@mihenhalani.com, c=IN