



™ **bhansali ENGINEERING POLYMERS LIMITED**

CIN : L27100MH1984PLC032637

Registered Office : 401, 4th Floor, Peninsula Heights, C. D. Barfiwala Road, Andheri (West), Mumbai - 400 058.
 Tel. : (91-22) 2621 6060/61/62/63/64 • Fax : (91-22) 2621 6077 • E-mail : abstron@bhansaliabs.com • Website : www.bhansaliabs.com

BEPL/SEC/2020/197

16th June, 2020

To The Manager The BSE Limited Corporate Relationship Department Phiroze Jeejeebhoy Towers, Dalal Street; Mumbai 400 001 Security Code: 500052	To The National Stock Exchange of India Ltd. Exchange Plaza, C-1, Block G, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051. Security Code: BEPL
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Sub: Annual Secretarial Compliance Report for financial year ended 31st March, 2020.

Dear Sir/Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019, attached is the Annual Secretarial Compliance Report dated 15th June, 2020 for the financial year ended 31st March, 2020, issued by M/s Rathi and Associates, Practicing Company Secretaries.

Kindly take the same on records.

Thanking you,

Yours faithfully,
 For **Bhansali Engineering Polymers Limited.**

Ashwin M. Patel
Company Secretary and GM (Legal)



Encl: As above

Rathi & Associates

COMPANY SECRETARIES

A-303, Prathamesh, 3rd Floor, Raghuvanshi Mills Compound, 11-12, Senapati Bapat Marg, Lower Parel (W), Mumbai - 400 013.
Tel.: 4076 4444 / 2491 1222 • Fax : 4076 4466 • E-mail : associates.rathi@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

of

Bhansali Engineering Polymers Limited ('the Company')

for the year ended 31st March, 2020

We have been appointed by the Company to submit the Annual Secretarial Compliance Report Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the financial year ended 31st March 2020.

We have examined:

- (a) the documents and records made available to us and explanations provided by the Company and its officers;
- (a) the filings/ submissions made by the Company to the BSE Limited and the National Stock Exchange of India Limited, from time to time;
- (b) website of the Company; and
- (c) such other documents and filings made by the Company which has been relied upon to make this certification.

for the year ended 31st March, 2020 ("Reporting 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, includes:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; and

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

Provisions of the following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') were not applicable to the Company during the Reporting Period:-

- a. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;
- b. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- c. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014
- d. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- e. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

and circulars/ guidelines issued thereunder.

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

- a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder.
- 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 our examination of those records.
- c) There were 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.
- d) The Listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March 2019	Actions taken by Listed entity, if any	Comments of Practising Company Secretary on the action taken by the Listed entity
Not Applicable				

- e) The listed entity has revised the terms of appointment of the Statutory Auditors in accordance with the requirements specified in the SEBI Circular No. CIR/CFD/CMD 1/114/2019 dated October 18, 2019.

**For RATHI & ASSOCIATES
COMPANY SECRETARIES**

HIMANSHU
SHANTILAL
KAMDAR

Digitaly signed by HIMANSHU SHANTILAL
KAMDAR
DN: c=IN, o=HIMANSHU SHANTILAL KAMDAR,
ou=, email=HIMANSHU@RATHI&ASSOCIATES.COM,
serialNumber=10244626043724033630
c=IN, email=HIMANSHU@RATHI&ASSOCIATES.COM
Date: 2020.06.15 13:30:22 +05'30'

**HIMANSHU S. KAMDAR
PARTNER**

FCS: 5171

COP: 3030

UDIN: F005171B000343179

Date: June 15, 2020

Place: Mumbai