BHARAT WIRE ROPES LTD.



BWRL/2022-23/SE/QC/06

To,

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

Date: 20th May, 2022

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 2021-2022

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 2021-2022.

Kindly take the same on your records.

For Bharat Wire Ropes Limited

Govinda Soni **Company Secretary and Compliance officer** Memb. No.: A38908

MUMBA

Encl.: As above

Rund



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

• Website: www.bharatwireropes.com • E-mail: info@bharatwireropes.com • CIN : L27200MH1986PLC040468

MIHEN HALANI & ASSOCIATES

Practicing Company Secretaries

A-501/L, Jaswanti Allied Business Centre, Kachpada, Ramchandralane Extn. Rd, Malad (West), Mumbai – 400 064, **2**: 022 – 6236 0279 **4**: mihenhalani@gmail.com

Annual Secretarial Compliance Report of Bharat Wire Ropes Limited for the year ended March 31, 2022

Τo,

The Board of Directors, Bharat Wire Ropes Limited CIN: L27200MH1986PLC040468 Plot No. 4, MIDC, Chalisgaon Industrial Area, Village - Khadki, Taluka - Chalisgaon, Jalgaon-424 101, Maharashtra, India BSE Scrip Code: 539799 / NSE SYMBOL: BHARATWIRE / ISIN: INE316L01019

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

a) all the documents and records made available to us 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, 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) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - Not Applicable during the period under review;
- 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 and Sweat Equity) Regulations, 2021;
- f) The Securities and Exchange Board of India (Issue and Listing Of Non-Convertible Securities) Regulations, 2021; 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, 2021 - 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, and
- j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars / guidelines issued thereunder and 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 except in respect of matters specified below;

Sr.	Compliance Requirement	Deviations	Observations/				
No.	(Regulations / circulars / guidelines including specific clause)		Remarks				
Not Applicable							

- ii. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from our examination of those records.
- iii. 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.	Action taken by	Details of	Details of action	Observations/		
No.		violation	taken E.g. fines,	remarks of the		
			warning letter,	Practicing		
			debarment, etc.	Company		
				Secretary, if any.		
Not Applicable						



iv. The listed entity has taken the following actions to comply with observations made in previous reports:

Sr.	Observations of the	Observations	Actions taken by	Comments of the		
No.	Practicing Company	made in the	the listed entity,	Practicing		
	Secretary in the	secretarial	if any	Company		
	previous reports	compliance		Secretary on the		
		report for		actions taken by		
		the year		the listed entity		
		ended				
Not Applicable						

For MIHEN HALANI & ASSOCIATES Practicing Company Secretaries

Date: 19/05/2022 Place: Mumbai UDIN: F009926D000347824



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