



MR & Associates

COMPANY SECRETARIES

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SECRETARIAL COMPLIANCE REPORT

OF

SHALIMAR WIRES INDUSTRIES LIMITED

FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2022

[Pursuant to SEBI Circular No. CIR/CFD/CMD 1/27/2019 dated 08/02/2019 issued by
Securities and Exchange Board of India]

To,
The Members,
SHALIMAR WIRES INDUSTRIES LIMITED
25 GANESH CHANDRA AVENUE,
Kolkata 700013
West Bengal

We have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. **SHALIMAR WIRES INDUSTRIES 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 on 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) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - Not Applicable as there was no reportable events during the Financial 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 as there was no reportable events during the Financial Year under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014/ Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021, as applicable;- Not Applicable as there was no reportable events during the Financial Year under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008/ Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as applicable; -Not Applicable as there was no reportable events during the Financial Year under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013/ Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as applicable; -Not Applicable as there was no reportable events during the Financial Year under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 / Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021, as applicable - Not Applicable as there was no reportable events during the Financial Year under review.



(k) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, subject to the following observations as specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
	N/A	N/A	N/A

(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/our examination of those records except signature of Chairman/ Directors could not be given while uploading the financial results for the Quarter and Half year ended 30.09.2021 as the meeting were held through audio visual means and results so the same were uploaded with the signatures of CFO and Company Secretary and by the Statutory Auditors in compliance with Regulation 33(2)(b) of SEBI (Listing Obligations and Disclosure Requirements) 2015.

(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.
1.	BSE Limited	Delay in submission of Share Holding Pattern in terms of Regulation 31(1) of SEBI (Listing Obligations and Disclosure Requirements) for the quarter ended 31 st March, 2021.	Notice issued by Stock Exchange imposing fine. The Company had paid penalty of Rs. 50,000/- + GST @18% to BSE Limited.	BSE had levied the penalty which company had paid off during the period under review. The company has informed that filing has been done within the stipulated time but could not be uploaded in BSE website due to technical fault.



(d) The listed entity had 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Delayed intimations under Regulation 30 (read with Schedule III) & 44(3) of SEBI (LODR) Regulations, 2015	31.03.2020	The Company had taken utmost care.	The Company had taken utmost care, so no further comment made.
2.	Delayed intimations due to COVID 2019 pandemic under SEBI (LODR) Regulations, 2015	31.03.2021	The Company had taken utmost care.	The Company had taken utmost care, so no further comment made.
3.	Non-Compliance with the provisions of Regulations 23(9) of SEBI(LODR) Regulations,2015 for 30th September, 2020	31.03.2021	The Company had applied for waiver of fine to Bombay Stock Exchange Ltd. which has been waived off by them vide their email dated 20.07.2021	The Company had taken utmost care so no further comment made.

(e)The listed entity has suitably included the conditions as mentioned in Para 6(A) and 6(8) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.

For MR & Associates
Company Secretaries
A Peer Reviewed Firm
Peer Review Certificate No.: 720/2020

Place: Kolkata
Date: 27.05.2022



Tanvee
[Tanvee]
Partner
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C P No.: 13573
UDIN : A034974D000408041