

Anand Kumar Sahu
B.Com., L.L.B., F.C.S.

Anand Kumar Sahu & Associates
Company Secretaries
"BHARAT-BHAWAN" B-11,
Sector 2, Agroha Society,
Raipura Raipur (C.G)
Phone: 0771-2227014 (O) 98271-56855(M)
Email: sahanand25@yahoo.co.in

SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2019

To,
The Board of Directors
Shri Bajrang Alloys Limited
CIN (L27103CT1990PLC005964)
521/C , Urla Industrial Complex, Urla, Raipur (C.G.)-493221

I Anand Kumar Sahu & Associates, Practising Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Shri Bajrang Alloys 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, 2019** ("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

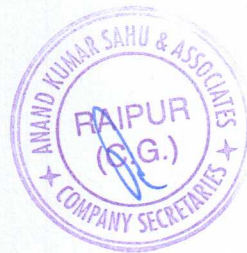


- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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 the Company has not issued any further share capital during the Review Period];**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 **[Not Applicable as there was no reportable event during the financial year under review];**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **[Not applicable as the Company has not bought back/propose to buyback any of its securities during the Review Period];**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[Not Applicable as there was no reportable event during the financial year under review];**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **[Not applicable as the Company has not issued and listed any debt securities during the Review Period];**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **[Not applicable as the Company has not issued and Listed any Non-Convertible and Redeemable Preference Shares during the Review Period];**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/guidelines issued thereunder;

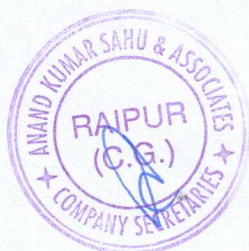
and based on the above examination, I hereby report that, during the Review Period:



- (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 Deviations Observations/ (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Reg. 34 (1) of LODR: The listed entity shall submit the annual report to the stock exchange within twenty one working days of it being approved and adopted in the annual general meeting as per the provisions of the Companies Act, 2013.	Late- Submission of Annual Report for the year ended March,2018	The Company has Submitted the Annual Report to Exchange dated 31.10.2018 (Late Filling of Annual Report to Exchange by 5 days)
2.	Reg.33 (3) (d) of LODR: The listed entity shall submit audited standalone financial results for the financial year, within sixty days from the end of the financial year to Exchange.	Late- Submission of financial results for March 2018	The Company has Submitted the Financial Result to Exchange dated 01.06.2018 (Late Filling of Financial Result to Exchange by 2 days)

- (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.
- (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:



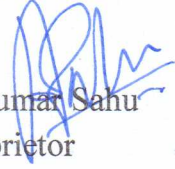
Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observation s/ Remarks of the Practicing Company Secretary,
1.	BSE (Stock Exchange)	Reg. 34 (1) of LODR: Late-Submission of Annual Report for the year ended March, 2018 (Late Filling of Annual Report to Exchange by 5 days)	SEBI Circular no. SEBI/HO/CFD/CMD/CIR/P/2018/77 dated May 3, 2018 the company is liable to pay fine of Rs. 11800/- (including GST) i.e 2000/- per day.	Company has submitted the Annual Report as per Reg. 34 (1) of LODR to Stock Exchange dated 31.10.2018 and Paid the fines for non-compliance
2.	BSE (Stock Exchange)	Reg.33 (3) (d) of LODR: Late-Submission of financial results for March 2018	SEBI Circular no. CIR/CFD/CMD/12/2015 dated November 30, 2015 the Company is liable to pay fine of Rs. 11800/- (including GST) i.e 5000/- per day.	Company has submitted the Financial Results as per Reg. 33(3) of LODR to Stock Exchange dated 01.06.2018 and Paid the fines for non-compliance.



(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable, since this report is being issued for the first time and accordingly no action was required to be taken by the Company.**

Place:- Raipur
Date:- 25.05.2019



For, Anand Kumar Sahu & Associates

Anand Kumar Sahu
Proprietor
FCS.7670, C.P. No. 6023