Shree Steel Wire Ropes Ltd.



MFRS. OF: STEEL WIRE ROPES, STEEL WIRE ROPE SLINGS, WIRE STRANDS, STAINLESS STEEL WIRE ROPES & ATDs (REGULATING EQUIPMENT), TRACTION BOND, SECTION INSULATOR ASSEMBLY & ANTICREEP WIRE

Administrative Office & Correspondence Address:

503-505, 5th Floor, Shiv Ashish Commercial Complex, Plot No. 10, 19th Road, Chembur, Mumbai - 400 071. (INDIA) Tel.: (022) 2527 4142 / 6739 9999

E-mail: info@sswrl.com + WEB: www.sswrl.com



May 27, 2021

CIN: L45202MH1992PLC067466

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001.

Scrip Code: **513488**

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2021.

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed secretarial compliance report for the year ended March 31, 2021 issued by CS Nisha Uchil, Practicing Company Secretary.

We request you to take the aforesaid on records. Thanking You,

Yours Faithfully,

Shree Steel Wire Ropes Limited

Anand Dubey Company Secretary and Compliance Officer

Encl. as above



NISHA UCHIL

PRACTISING COMPANY SECRETARY

B/404, Prathamesh Society, Opp Laxmi Park, Thakurli Station Road, Thakurli East, Dombivli - 421201 Contact: 9820920627 / uchil.nisha@gmail.com

SECRETARIAL COMPLIANCE REPORT OF SHREE STEEL WIRE ROPES LIMITED FOR THE YEAR ENDED 31.03.2021

I, Nisha Uchil, have examined:

- a) all the documents and records made available to us and explanation provided by SHREE STEEL 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 31.03.2021 in respect of compliance with the provisions of:
 - i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - 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;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements)
 Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



NISHA UCHIL

PRACTISING COMPANY SECRETARY

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- e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- h) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) (other regulations as applicable) and circulars/ guidelines issued thereunder; and based on the above examination, I/We 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.
- (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.	Action Taken	Details of Violation	Details of Action	Observations!	
No.	by		taken E.g. fines,	remarks of the	
			warning letter,	Practicing	
			debarment, etc.	Company	
				Secretary, if	
				any.	
-	-	-	-	-	



NISHA UCHIL

PRACTISING COMPANY SECRETARY

B/404, Prathamesh Society, Opp Laxmi Park, Thakurli Station Road, Thakurli East, Dombivli - 421201 Contact: 9820920627 / uchil.nisha@gmail.com

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations		Observations	Actions taken	Comments of
	of	the	made	by the listed	the
	Practicing	in the secretarial		entity, if any	Practicing
	Company		compliance		Company
	Secretary	in	report		Secretary on the
	the	previous	for the year		actions taken by
	reports		endeth		the listed entity





Nisha Uchil

Practising Company Secretary

ACS - 24798

CoP - 8995

UDIN: A024798C000380516

Date: 27.05.2021

Place: Thane

ANNEXURE

To,
The Members
Shree Steel Wire Ropes Limited

Our report of even date is to be read along with this letter.

- 1. Maintenance of secretarial record is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on our audit.
- 2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
- 3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
- 4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
- 5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
- 6. The Secretarial Audit report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.





Nisha Uchil Practising Company Secretary ACS – 24798

CoP - 8995

UDIN: A024798C000380516

Date: 27.05.2021 Place: Thane