



BTTL/ May 27, 2021

BSE Limited Corporate Relationship Department, 1st Floor, New Trading Ring, Rotunda Building, P.J. Towers, Dalal Street, MUMBAI - 400 001

<u>Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2021</u>

Dear Sir/Madam,

In compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8th, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by M/s. Manisha Gupta and Associates, Company Secretaries for the financial year 2020-21.

Kindly take the same on records.

Thanking you,

Yours faithfully,

For BHILWARA TECHNICAL TEXTILES LIMITED

ARJUN SHARMA

Aojun Sharing

COMPANY SECRETARY & CFO

ACS - 47848

Email: bttl.investor@lnjbhilwara.com

Encl.: As above

Bhilwara Technical Textiles Limited

Fax: +91-120-4277841 Website: www.bttl.co.in Fax: +91-2961-231254 Website: www.lnjbhilwara.com GSTIN: 08AADCB5709M1ZF Manisha Gupta B. Com (H), L.L.B, FCS MANISHA GUPTA & ASSOCIATES COMPANY SECRETARIES WZ-1003, IInd Floor, Rani Bagh, Delhi-110034 Ph: - 011-45053912

Mobile: - 9911662021, 9911433045 E-mail: manisha.pcs@gmail.com

Annual Secretarial Compliance Report

Secretarial compliance report of **Bhilwara Technical Textiles Limited** for the year ended **31st March**, **2021**

I Manisha Gupta proprietor of M/s Manisha Gupta & Associates, Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Bhilwara Technical Textiles 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 ("Review Period") in respect of compliance with the provisions of:
- (1) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- (2) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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
- (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
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable

Manisha Gupta B. Com (H), L.L.B, FCS

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- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (Other regulations as applicable) And circulars/ guidelines issued there under;

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, except in respect of matters specified below:-

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

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far as it appears from my 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 there under

S.No	Action Taken By	Details of Violation	Details of Action Taken e.g. Fines warning letter, debarment, e.t.c	Observation/Remarks of PCS if Any.

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

S.No	Observation of the PCS in Previous Reports	Observation Made in the Secretarial Compliance Report For the Year ()	Action taken by the Listed Entity (if Any)	Comments of PCS On Action Taken by the Listed Entity				

(Note:

- 1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.
- 2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/observations. E.g. In the report for the year ended 31st Mar, 2021, the PCS shall provide a list of:
- all the observations in the report for the year ended 31st Mar, 2020 along with the actions taken by the listed entity on those observations.
- the observations in the reports pertaining to the year ended 31st Mar,2020 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/observations in those reports.)

For Manisha Gupta & Associates (Company Secretaries)



Manisha Gupta Practicing Company Secretary Mem. No. F6378 CP No. 6808

Date: -21st May, 2021

Place: - Delhi

UDIN: -F006378C000335333