



**RAJRATAN**

OUTPERFORM

INDIA | THAILAND

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RGWL/20-21/

31<sup>st</sup> July, 2020

<b>To</b> <b>BSE Limited</b> <b>Phiroze Jeejeebhoy Towers</b> <b>Dalal Street</b> <b>Mumbai 400001</b> <b>Scrip Code – 517522</b>	<b>To</b> <b>National Stock Exchange of India Limited</b> <b>‘Exchange Plaza’, C-1, Block G,</b> <b>Bandra Kurla Complex,</b> <b>Bandra (E), Mumbai – 400 051</b> <b>Symbol - RAJRATAN</b>
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**Subject: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020**

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/2712019 dated 8<sup>th</sup> February, 2019, we hereby enclose the Annual Secretarial Compliance Report of the Company issued by Practicing Company Secretary for the year ended 31<sup>st</sup> March, 2020.

This is for your information and record

**For Rajratan Global Wire Limited**

  
**Shubham Jain**

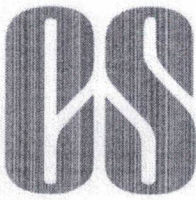
**Company Secretary & Compliance Officer**



**RAJRATAN GLOBAL WIRE LIMITED**

Regd. Office: Rajratan House, 11/2, Meera Path, Dhenu Market, Indore-452003, Madhya Pradesh, India. Tel.: +91-731-2546401  
Factory: 200-B, Sector-1, Pithampur-454775, Dist. Dhar, Madhya Pradesh, India. Tel.: +91-7292-253429, 253375

CIN No. L27106MP1988PLC004778



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**Secretarial compliance report of Rajratan Global Wire Limited for the  
year ended 31<sup>st</sup> March, 2020**

I, Vatsalya Sharma, has examined:

- (a) All the documents and records made available to us and explanation provided by **Rajratan Global Wire Limited** (“the listed entity”),
- (b) The filings/ submissions made by the listed entity to the stock exchange,
- (c) Website of the listed entity- [www.rajratan.co.in](http://www.rajratan.co.in),
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended on 31<sup>st</sup> March, 2020 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 Act (“SEBI”);

The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include: -

- a) The Securities 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
- 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 during the audit period);**
- e) Securities and Exchange Board of India (Share based Employee Benefits) Regulations, 2014 **(Not applicable during the audit period);**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2013 **(Not applicable during the audit period);**





- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not applicable during the audit period**);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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 (Regulations/Circular/guidelines including specific Clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.		Nil	

- 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 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.	Observations / Remarks of the Practicing Company Secretary, if any



1.	BSE	Regulation 17(1) of SEBI (LODR) Regulations, 2015 Non-Compliance of with the requirements pertaining to the composition of Board.	BSE levied fine of Rs. 5,31,000 including GST of Rs. 81,000	The company paid the fine of Rs. 5,31,000 including GST of Rs. 81,000. Further the composition of the Board w.e.f. 01.04.2019 is in line with requirements of Regulation 17(1) of SEBI (LODR) Regulations, 2015.
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- (a) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in 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
				Nil

For Vatsalya Sharma & Company  
Company Secretaries

Date – 30.07.2020  
Place - Indore

Vatsalya Shama  
Proprietor  
M. No. - 48100  
COP - 19574



UDIN – A048100B000531737