



Niraj Cement Structurals Ltd

Dated: 30th May, 2022

To,

The Corporate Relations Department. BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001 Script Code: 532986	National Stock Exchange of India Exchange Plaza Bandra Kurla Complex, Bandra East Mumbai 400 051 Script Symbol : NIRAJ
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Dear Sir/Madam

Sub: Annual Secretarial Compliance Report for the period ended 31st March, 2022.

In terms of Regulation 24A of SEBI (Listing and Obligations and Disclosure Requirements) Regulation, 2015 please find enclosed herewith Annual Secretarial Compliance Report for the period ended 31st March, 2022 issued by Practising Company Secretary.

Kindly take the same on record.

Sincerely,

For Niraj Cement Structurals Limited

Anil Anant Jha
Company Secretary & Compliance Officer
ACS: 66063



CIN : L26940MH1998PLC114307

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Fax : 2551 8736 • E-mail : info@niraj.co.in • Website : www.niraj.co.in
Factory : C-55, TTC Industrial Area, Thane Belapur Road, Navi Mumbai. Tel : 2768 1695 / 2768 0645



AJP & ASSOCIATES

Company Secretaries & Trademark Agent

SECRETARIAL COMPLIANCE REPORT OF NIRAJ CEMENT STRUCTURALS LIMITED (For the year ended 31st March, 2022)

To,
Niraj Cement Structurals Limited
Sunder Baug, Opp. Deonar Bus Depot
Deonar, Mumbai - 400088

I, **Abhaykumar J. Pal** have examined:

- (a) all the documents and records made available to us and explanation provided by **Niraj Cement Structurals Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) other documents/ filings, which were relevant and relied upon to issue this certificate,

for the year ended 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;



Sai Dham Shopping Plaza, Nr. Sai Baba Mandir, P. K. Road, Mulund (W), Mumbai- 400080

● +91 90293 66180 / 96534 33544

● csabhaypal@gmail.com

- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; ***Not applicable to the Company during the review period.***
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ***Not applicable to the Company during the review period.***
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***Not applicable to the Company 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 to the Company during the review period.***
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

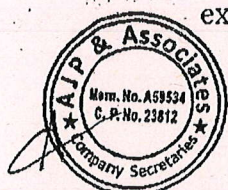
and circulars/ guidelines issued thereunder, and based on the above examination,

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, 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
Not applicable			

- (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.

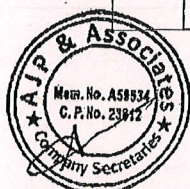


- (c) The following are the details of actions taken against the listed entity/ its-promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ 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.
Not applicable				

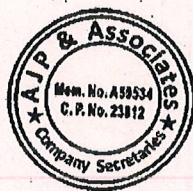
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
1.	Regulation 33- Financial Results under SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 : There was delay of 43 days in submission of the financial results for the quarter ended as on 31 st December, 2020.	April 01, 2020 to March 31, 2021	The company was paid the fine of Rs. 2,42,000 (incl. GST) each to BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) on dated 28 th April, 2021 & 30 th March, 2021 respectively.	The Company was paid the fine and complied the provision.



2.	Regulation 23 (9) - Disclosure on Related Party Transaction under SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015: There was delay of 79 days in filing of disclosure on Related Party Transactions (RPT) for the half-year ended on 30 th September, 2020.	April 01, 2020 to March 31, 2021	The Company had requested to BSE Limited to waive off the fine of Rs. 206,500 (incl. GST).	The BSE has waived of its fine vide its e-mail dated 13th August, 2021.
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FOR AJP & ASSOCIATES
Company Secretaries



(Handwritten signature)

Date: 30/05/2022
Place: Mumbai
UDIN. A059534D000424030

Abhay J. Pal
ACS. 59534 & CP. 23812
PR. 2078/2022