

Niraj Cement Structurals Ltd

Dated: 28th July 2020,

To,

The Corporate Relationship Department

BSE Limited

Phiroze Jeejeebhoy Towers,

Dalal Street,

Mumbai 400 001.

Scrip Code: 532986

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the period ended 31st March, 2020.

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, 2020 issued by Practising Company Secretary.

Kindly take the same on record.

Sincerely,

For **Niraj Cement Structurals Limited**

Gulshan Chopra
Managing Director
DIN01068051



CIN : L26940MH1998PLC114307

Office : Niraj House, Sunder Baug, Near Deonar Bus Depot, Deonar, Chembur, Mumbai - 400 088. Tel.: 6602 7100

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



DNG & ASSOCIATES

Company Secretaries

203, Corporate Avenue, Sonawala Road, Goregaon (E), Mumbai 400063

Contact No. 9029674929; 7977880996, Email id: dng.associates1@gmail.com;

Secretarial compliance report of NIRAJ CEMENT STRUCTURALS LIMITED for the year ended 31st March, 2020

I Nehil G. Dugar, Practicing Company Secretary have examined:

- all the documents and records made available to us and explanation provided by Niraj Cement Structurals Limited ("the listed entity");
- the filings/ submissions made by the listed entity to the stock exchanges;
- website of the listed entity; and
- such other documents and filings made by the Company which has been relied upon to make this certification.

for the year ended 31st March, 2020 in respect of compliance with the provisions of:

- 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: -

- 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;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- Securities and Exchange Board of India (Prohibition of fraudulent and unfair trade practices relating to securities market) (Amendment), Regulations, 2018;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 And circulars/ guidelines issued thereunder;

Note: The aforesaid list of SEBI Regulations is only the list of Regulations which were applicable to the Company during the year under review.





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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/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 33 of SEBI (LODR), 2015	The Company had filed the audited financial results for the year ended as on 31 st March, 2019 on 12 th June, 2019	Delay of 13 days in filing of Audited Financial results for the financial year ended 31 st March, 2019.

- 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.





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- 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 LIMITED ("BSE")	Delay of 13 Days in Filing Audited Financial Results for the year ended 31 st March, 2019	Penalty of Rs. 76,700/- (including GST) was claimed for the said delay by the board, which was paid by the Company.	The company had to file its audited financial results for the year ended as on 31 st March, 2019 within 60 days from the year end but the company failed to do so and had filed the same in 73 days from year end.





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(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	Delay of 14 days in filing of Audited Financial results for the financial year ended 31 st March, 2018.	31 st March, 2018	Penalty of Rs. 88,500/- (including GST) for the said delay was paid.	The Company had defaulted and paid penalty for the same on time.
2	Delay of 1 day in listing of its 20,00,000 equity shares of Rs. 10/- each issued as equity shares on preferential basis	31 st March, 2018	Penalty of Rs. 20,000/- for the said delay was paid.	The Company had defaulted and paid penalty for the same on time.





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- (e) The listed entity has complied with provisions of SEBI Circular CIR/CFD/CDM1/114/2019 dated 18th October, 2019 in respect of appointment of Auditor, to the extent applicable.

For **DNG & ASSOCIATES**
COMPANY SECRETARIES

NEHIL G. DUGAR
PROPRIETOR
Membership No: 51130
COP No.: 18952
UDIN: A051130B000451321

Date: 14th July, 2020
Place: Mumbai

