

NSIC-CRISIL Rated Company, An ISO 9001-2015 Company

Registered Office : (Unit II) 274/2, Samlaya-shepura Road, Village : Pratapnagar, Taluka: Savli, District : Vadodara-391520, Gujarat-India.
(L) : 091-2667-296016 (M) : +91 8511148598 Email : cs@bansalroofing.com
CIN No. L25206GJ2008PLC053761, Website : www.bansalroofing.com

BRPL/BSE/Regulation 24A/21-22

Date: 17.05.2022

To,
General Manager
BSE Limited
Phiroze Jeejeebhoy Towers,
Dala Street,
Mumbai – 400001

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

Ref.: Scrip Code – 538546

Dear Sir/ Madam,

We here with submit Annual Secretarial Compliance Report pursuant to the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, issued by M/s. Devesh R. Desai for year ended 31st March, 2022.

Kindly take the same in your record.

Thanking You,
For Bansal Roofing Products Limited



Archi Shah
Company Secretary & Compliance Officer
Encl. As Attached





Devesh R. DESAI
COMPANY SECRETARY

40-D, Arpita Park, Near ESI Hospital,
Gotri Road, Vadodara-390 021.
(M) 9879533717

Devesh R. Desai
M.Com. LL.B. ACS
deveshrdesai2002@rediffmail.com

To,
The Board of Directors,
Bansal Roofing Products Limited,
CIN No. L25206GJ2008PLC053761
274/2, Samlaya Sherpura Road,
Village: pratapnagar, Near Samlaya Railway Station,
Taluka : Savli, Vadodara-391520.

Sub.: Annual Secretarial Compliance Report for the Financial Year 2021-2022

Dear Sir,

I have been engaged by BANSAL ROOFING PRODUCTS LIMITED (hereinafter referred to as the 'Company') [CIN: (L25206GJ2008PLC053761) whose equity shares are listed on BSE Limited, to conduct an audit in terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the Management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report for the year ended 31st March, 2022 is enclosed.



Devesh R. Desai
Practicing Company Secretary
ACS#11332 CP#7484
Place: Vadodara
Date: 17th May, 2022
UDIN No. A011332D000332345
Peer Review Certificate No. : 2043/2022



Devesh R. DESAI
COMPANY SECRETARY

40-D, Arpita Park, Near ESI Hospital,
Gotri Road, Vadodara-390 021.
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Secretarial Compliance Report of Bansal Roofing Products Limited
for the year ended 31st March, 2022

I Devesh R. Desai, Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by **Bansal Roofing Products Limited (CIN No. L25206GJ2008PLC053761)** (“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 31st March, 2022 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;

(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; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable;

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder (hereinafter as “Insider Trading regulations”);

(i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation, 2009. There are no events occurred during the period which attracts provisions of these regulations, hence not applicable

(j) Securities and Exchange Board of India (Depositories and Participants) Regulation, 2018.

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! circulars! guidelines including specific clause)	Deviations	Observations! Remarks of the Practicing Company Secretary
1	Regulation 295 (1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018	BSE Imposed Fine of Rs. 40,000/- + Applicable Tax	Fine imposed by the stock exchange which the Company had paid with sufficient

		(for 2 days delay for Non-compliance of Regulation 295 (1))	justification and reasoning.
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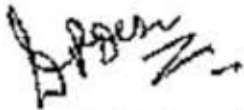
(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.

(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 Limited	Regulation 295 (1) of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018	BSE Imposed Fine of Rs. 40,000/- + Applicable Tax (for 2 days delay for Non-compliance of Regulation 295 (1))	Fine imposed by the stock exchange which the Company had paid with sufficient justification and reasoning.

(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 endeth <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NOT APPLICABLE		



Devesh R. Desai
Practicing Company Secretary
ACS#11332 CP#7484



Place: Vadodara
Date: 17th May, 2022
UDIN No. A011332D000332345
Peer Review Certificate No. : 2043/2022