BIHAR SPONGE IRON LIMITED.

REGISTERED OFFICE & PLANT : UMESH NAGAR, CHANDIL-832401, DISTT. SARAIKELA - KHARSAWAN, JHARKHAND
PHONE (EPABX) : 06591-232410, 232417, Fax : 06591-232412
E-mail : bsilchandil@gmail.com / Web : bsil.org.in, CIN : L27106JH1982PLC001633

BSIL/CS/SE/2020

31.07.2020

To
The Manager
The Bombay Stock Exchange Limited
25th Floor, P.J. Towers,
Dalal Street
Mumbai-400001

Subject: Annual Secretarial Compliance Report for the year ended 31st March, 2020.

Scrip Code: 500058

Dear Sir,

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with **SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019,** we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March 2020, issued by Mr. Rahul Singhal, Proprietor, M/s R. Singhal & Associates, Practicing Company Secretaries.

Kindly take the same in your records.

Thanking you,

For BIHAR SPONGE IRON LTD

Bihar Sponge Iron Ltd. Jharkhand

Himani Mittal
Company Secretary & Compliance officer
E-mail: companysecretary@bsil.org.in

Encl: as above

R. SINGHAL & ASSOCIATES
COMPANY SECRETARIES
95, SARASWATI MANDIR
S.K. ROAD, MEERUT-250001
MOB. (+91) 98084 83964

Ref.   Date:

Secretarial compliance report of BIHAR SPONGE IRON Limited

For the year ended on 31.03.2020

To,
The Members,
BIHAR SPONGE IRON LIMITED
Umesh Nagar, Chandil
Dist. Saraikela Kharsawan
Pin 832401

Wehave examined:

(a) all the documents and records made available to us and explanation provided by BIHAR SPONGE IRON 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 on 31.03.2020 ("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;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;- **Not Applicable during the Review Period**

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(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 Review Period**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;**Not Applicable during the Review Period**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;**Not Applicable 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 during the Review Period**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Circular / guidelines issued thereunder and based on the above examination, 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	Unit Comment
1.	As per the Cir/ISD/ 3/2011, the shareholding of promoters and group of promoters to be 100% in dematerialized form.	The Shareholding of promoters and the promoter'sgroup are dematerialized only to the extent of 48.24% sharesas on 31.03.2020	Management informed us that the Company has intimated the promoters to get the shares dematerialized, the same is in process.
2.	Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	As per examination of records and information available to us, the Company has not maintained the structured digital database as on the date of the signing of this report.	The Company has all requisite documents and registers manually and is in process of digitalisation of the database of the Company.

R. SINGHAL & ASSOCIATES
MEERUT
COMPANY SECRETARIES

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our 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 letters, debarment etc..	Observations / remarks of the Practicing Company Secretary, if any
2.	BSE Limited	Late submission of Financial Results for the quarter ended 31.12.2019 as per Regulation 33 of SEBI (LODR) Regulations, 2015	Fine of Rs. 5900/- imposed by the BSE Limited, as per Notice no. LIST/COMP/500058 /Reg.33-Dec-19/323/2019-20, dated 3rd March 2020.	The Company has paid the said fine of Rs. 5900/- vide Cheque no. 500058, dated 12.03.2020.

(d) The listed entity is in process to take action on the observations made by Practicing Company Secretary (Secretarial Auditors) in previous report.

For R. Singhal & Associates
Company Secretaries

(Rahul Singhal)
Proprietor
Mem. No.: 29599
C P No.: 10699

Place: Meerut
Date: 23.07.2020
UDIN: A029599B000528999