

29th June, 2021

To,
Corporate Relationship Department
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400001.

Ref: RAM RATNA WIRES LIMITED (Scrip Code: 522281)

Sub.: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, and SEBI Circular no. CIR/CFD/CMD1 /27/2019 dated 8th February, 2019, please find enclosed the Annual Secretarial Compliance Report furnished by Mr. Anup Vaibhav C. Khanna, Partner, M/s Khanna & Co., Practicing Company Secretary (COP No. 12906), for the financial year ended 31st March, 2021.

You are requested to kindly take on record the same.

Thanking you,

Yours faithfully,
For Ram Ratna Wires Limited

A handwritten signature in blue ink, appearing to read 'Saurabh Gupta', is written over a horizontal line.

Saurabh Gupta
Company Secretary & Compliance Officer
M. No.: A53006

SECRETARIAL COMPLIANCE REPORT OF RAM RATNA WIRES LIMITED
FOR THE FINANCIAL YEAR ENDED 31 MARCH 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, Khanna & Co, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Ram Ratna Wires Limited** (“the listed entity”), the representations made by the Management and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, arising from the compliances of specific Regulations listed below,
- (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 31 March 2021 (“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 applicable to the listed entity, 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

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	Observations / Remarks of the Practicing Company Secretary
1.	Regulation 39(2) and Regulation 40(3) of the Securities and Exchange Board of India (Listing Obligations and Disclosure limits Requirements) Regulations, 2015	Delay in issuing share certificate beyond the prescribed time limits	We note that there was 1 (one) delay in issuance of share certificate subsequent to effecting transfer of shares during the half year ended 31 March 2021. We have been informed by Datamatics Business Solutions Limited (the new RTA of the listed entity) that the delay for the said 1 (one) request during the month of December 2020 was due to the change in the RTA (from Big Share services Private Limited to Datamatics Business Solutions Limited), takeover activities and updation of Master data in their system, etc.

(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 letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NIL				

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	We note that there were delays in issuance of share certificates subsequent to effecting transfer of shares during the half year ended 30 September 2019 for transfer requests accepted post 31 March 2019 in view of earlier discrepancies received. We have been informed that the delays were due to delays in actioning	In the report for the year ended 31 March 2020	The Company has changed the Registrar and Transfer Agent from Bigshare Services Private Limited to Datamatics Business	The Company has changed the Registrar and Transfer Agent from Bigshare Services Private Limited to Datamatics Business

	and processing the requests from shareholders by the Registrar and Transfer Agent because of spurt in volumes of transfers and demat requests due to change in the SEBI regulations (like change in the LODR banning physical transfers w.e.f. 5th December 2018, which was subsequently extended till 31st March 2019.		Solutions Limited.	Solutions Limited w.e.f. 1 December 2020
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**For KHANNA & CO.
Practicing Company Secretaries**



**Anup Vaibhav C. Khanna
Partner
Membership No.: F6786
CP No.: 12906
UDIN: F006786C000500389
Peer Review: 638/2019**

**Place: Navi Mumbai
Date: 23 June 2021**