



Rohit Ferro-Tech Ltd.

CIN No. : L27104WB2000PLC091629
(Under Corporate Insolvency Resolution Process)

Corporate & Communication Office :

SKP HOUSE

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Web : www.rohitferrotech.com

Works :

(Unit - I) : WBIDC Road, P.O.Dwarika P.S. Bishnupur, Dist. Bankura (W.B.) Pin - 722 122

(Unit - II) L Kalinganagar Industrial Complex, Duburi, Dist. Jaipur, Orissa - 755026

(Unit - III) : Bhunia Raichak, Joynagar, P.S. Durga Chak, Dist. East Medinipur, Haldia, Wsst Bengal

24th June 2021

<p>The Listing Department BSE Limited P.J. Towers, 25th floor Dalal Street Mumbai - 400 001</p> <p><u>BSE SCRIP CODE : 532731</u></p>	<p>The Listing Department National Stock Exchange of India Limited Exchange Plaza, C-I, Block - G Bandra Kurla Complex Mumbai - 400 051</p> <p><u>NSE SYMBOL : ROHITFERRO</u></p>
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Dear Sir/Madam,

Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to the Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we enclose herewith Secretarial Compliance Report issued by M/s. K. C. Dhanuka & Co., Company Secretaries, for the Financial year ended March 31, 2021.

Kindly take the same on your record.

Thanking You
Yours Sincerely
For **Rohit Ferro-Tech Limited**

Anil Prasad Shaw
(Company Secretary)
Encl: as above

**Secretarial Compliance Report of Rohit Ferro-Tech Limited
for the year ended 31st March, 2021**

We have examined:

- a) all the documents and records made available to us and explanation provided by M/s. Rohit Ferro-Tech 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 31st 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, 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;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- 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;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	The Company has delayed in submission of Financial Results for the Quarter and Year ended 31 st March, 2020.	The Company had complied with Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 with a delay of 24 days. Show cause Notice for this has been issued by National Stock Exchange of India Limited (NSE) and BSE Ltd and the same was replied by the Company. Further, the penalty of Rs. 120000/- and Rs. 80000/-, excluding GST has been levied by NSE and BSE, respectively, and the company has requested for waiver which is still under final consideration of NSE and BSE.

- 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 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
1	BSE Limited	Late submission of the Financial Results for the Quarter and Year ended 31 st March, 2020 under Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.	The show cause Notice has been issued by BSE Ltd. and the penalty of Rs. 80000/- excluding GST has also been levied.	The Company had duly replied the show cause Notice received from BSE Ltd. and has requested for waiver of penalty which is still under final consideration of BSE.
2	National Stock Exchange of India Limited. (NSE)	Late submission of the Financial Results for the Quarter and Year ended 31 st March, 2020 under Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements	The show cause Notice has been issued by NSE and the penalty of Rs. 120000/- excluding GST has also been levied.	The Company had duly replied the show cause Notice received from NSE and has requested for waiver of penalty which is still under final consideration of NSE.



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

Sr. No.	Observations/ Remarks 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)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
NOT APPLICABLE				

- e) The powers of the Board of Directors are suspended, Board 's Report for the year ended 31st March, 2020 was signed by the Chief Financial Officer (CFO) and Company Secretary (CS).
- f) The reporting of clause 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India is not applicable during the review period.

NOTE: Due to Covid-19 pandemic situation and lockdown by the State Government, we have conducted online verification and examination of records, as facilitated by the Company for the purpose of issuing the report.

Place : Kolkata

Date : 23rd day of June, 2021



For K. C. DHANUKA & CO.

Company Secretaries

K. C. Dhanuka

22/06/2021

K. C. DHANUKA Proprietor

FCS - 2204, CP - 1247

Peer Reviewer No. 108

UDIN : F002204C000503111