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BTTL/  
May 29, 2019

BSE Limited  
Corporate Relationship Department,  
1st Floor, New Trading Ring, Rotunda Building, P.J. Towers,  
Dalal Street, MUMBAI - 400 001.

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March, 2019**

Dear Sir,

In compliance of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Mrs. Manisha Gupta of M/s. Manisha Gupta & Associates, Practicing Company Secretary for the financial year 2018-19.

Kindly take the same on records.

Thanking you,

Yours faithfully,  
For **BHILWARA TECHNICAL TEXTILES LIMITED**

*Arjun Sharma*

**ARJUN SHARMA**  
**COMPANY SECRETARY**  
**ACS - 47848**  
**Encl.: As above**



**Bhilwara Technical Textiles Limited**

**Corporate Office :**  
Bhilwara Towers, A-12, Sector-1  
Noida - 201 301 (NCR-Delhi), India  
Tel. : +91-120-4390300 (EPABX)  
Fax : +91-120-4277841  
Website: www.bttil.co.in

**Registered Office :**  
LNJ Nagar, Mordi, Banswara - 327 001 (Raj.) India  
Tel. : +91-2961-231251-52, 231385, +91-2962-302400  
Fax : +91-2961-231254  
Website: www.lnjbhilwara.com  
GSTIN: 08AADCB5709M1ZF

**Corporate Identification No.:** L18101RJ2007PLC025502

**MANISHA GUPTA**  
B.Com (H), L.L.B, FCS

**MANISHA GUPTA & ASSOCIATES**  
COMPANY SECRETARIES  
WZ-1003, IInd Floor, Rani Bagh, Delhi-34  
Phone: 011-45053912  
Mobile: +91-9911662021, 9911433045  
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## Annual Secretarial Compliance Report

Secretarial compliance report of **Bhilwara Technical Textiles Limited** for the year ended **31<sup>st</sup> March, 2019**

I Manisha Gupta proprietor of Manisha Gupta & Associates, Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Bhilwara Technical Textiles 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 ("Review Period") in respect of compliance with the provisions of:
  - (1) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
  - (2) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;  
**Not Applicable**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable**



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- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) ..... (Other regulations as applicable)

And circulars/ guidelines issued there under;

And based on the above examination, I/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

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far 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 there under

S.No	Action Taken By	Details of Violation	Details of Action Taken e.g. Fines warning letter, debarment, e.t.c	Observation/Remarks of PCS if Any.



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

S.No	Observation of the PCS in Previous Reports	Observation Made in the Secretarial Compliance Report For the Year ( )	Action taken by the Listed Entity (if Any)	Comments of PCS On Action Taken by the Listed Entity

(Note:

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.

2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations. E.g. In the report for the year ended 31st Mar, 2021, the PCS shall provide a list of:

- all the observations in the report for the year ended 31st Mar, 2020 along with the actions taken by the listed entity on those observations.
- the observations in the reports pertaining to the year ended 31st Mar, 2020 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.)

Place: New Delhi  
Date: 29-05-2019

Signature: *Manisha Gupta*  
Manisha Gupta  
Practicing Company Secretaries  
FCS No. 6378  
CP No. 6808

