



Birla Corporation Limited
Corporate Office:
1, Shakespeare Sarani,
A.C. Market (2nd Floor), Kolkata 700 071
P: 033 6603 3300-02
F: +91 332288 4426
E: Coordinator@birlacorp.com

Ref. No. 74G/

28th May, 2021

Corporate Relationship Department
BSE Limited
1st Floor, New Trading Ring, Rotunda Building,
P.J. Towers, Dalal Street, Fort,
Mumbai- 400 001
Scrip Code: 500335

The Manager
Listing Department,
National Stock Exchange of India Limited
'Exchange Plaza', C-1, Block G,
Bandra-Kurla Complex, Bandra (East),
Mumbai- 400 051
Scrip Code: BIRLACORPN

Dear Sir(s),

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

Pursuant to Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company issued by M/s. Mamta Binani & Associates, Company Secretaries, for the financial year ended 31st March, 2021.

This is for your information and records.

Thanking you,

Yours faithfully,
For **BIRLA CORPORATION LIMITED**

(MANOJ KUMAR MEHTA)
Company Secretary & Legal Head

Encl: as above

ANNUAL SECRETARIAL COMPLIANCE REPORT

OF

BIRLA CORPORATION LIMITED

FOR THE YEAR ENDED 31.03.2021

We have examined:

- (a) all the documents and records made available to us and explanation provided by Birla Corporation 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 31.03.2021 (“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) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



Mamta Binani & Associates

COMPANY SECRETARIES

- (d) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (f) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015;
- (g) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

and based on the above examination 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, 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,
- (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.	Actions 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
Not Applicable				

- (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 report	Observations made in the secretarial compliance report for the year end.... <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
1.	Delay in submission of the statement on shareholder complaints for the quarter ended June 2019 within the period prescribed.	Financial year ended 31st March, 2020.	<p>The delay was caused due to some technical issues in the system. However, the company had duly submitted the statement on shareholder complaints to the BSE once again.</p> <p>The Company had contested the levy of fine by BSE of INR 8,260/- (Rupees Eight Thousand Two Hundred and Sixty Only) including GST @18% and had deposited the said amount under protest.</p>	The Company had once again submitted the statement on shareholder complaints for the quarter ended June 2019 with the exchange and also paid the fine under protest.

(e) The Listed entity had complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019, in terms of Para 6(A) and 6(B) of the said circular and had suitably modified the terms of appointment of its Statutory Auditors.



Mamta Binani & Associates

COMPANY SECRETARIES

Thanking You,

For Mamta Binani & Associates

Madhuri Pandey

CS Madhuri Pandey
Partner
CP No.: 20723
Membership No: A55836



UDIN: A055836C000282920

Place: Kolkata

Date: 12.05.2021

