

BTL/SE/Reg. 24A/2021-2022

30th June, 2021

BSE Ltd. First Floor, New Trading Ring, Rotunda Building, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai – 400001	National Stock Exchange of India Ltd. “Exchange Plaza”, Plot no. C/1, G. Block Bandra-Kurla Complex, Bandra (E) Mumbai – 400051
BSE Scrip Code – 542932	NSE Symbol – BIRLATYRE

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sirs,

In compliance with Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith a copy of Annual Secretarial Compliance Report dated 29th June, 2021 for the financial year ended 31st March, 2021, issued by CS Ritu Bajaj, Practicing Company Secretary (FCS - 9913/CP No.-11933).

You are requested to take the same on your record.

Thanking you.

Yours faithfully,

For Birla Tyres Limited



Saurabh Mantri
Company Secretary & Compliance Officer

Encl: As above



RP & ASSOCIATES

COMPANY SECRETARIES

Secretarial compliance report of M/s. Birla Tyres Limited www.rpaonline.in
for the year ended 31st March, 2021

I, Ritu Bajaj, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by *Birla Tyres 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; (Not Applicable to the company for the period under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the company for the period under review)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the company for the period under review)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the company for the period under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Circulars/ guidelines issued thereunder;

"RicoH", Salt Lake Electronics Complex, Plot No. – A1/1 & 2, Block – GP
Sector – V, Room No. – 5, Kolkata – 700091, Phone: +91 33 40313000

Email – rbajaj@rpaonline.in



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
1.	Regulation 13 (3) of SEBI (LODR) Regulations, 2015 for the quarter ended 31st March, 2020	Delay of 13 days	Fine levied by the exchanges. Company requested for waiver and the same was granted by the BSE and NSE on 25 th January, 2021 and 13 th November, 2020 respectively.
2	Regulation 33 of SEBI (LODR) Regulations, 2015 for the quarter ended 31st December, 2020	Delay of 21 days	Fine levied by the Exchanges and the same was paid by the Company.

(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.
1.	BSE/NSE	Delay of 13 days in filing as per Reg. 13(3) of SEBI (LODR) Regulations, 2015 for the quarter ended 31 st March, 2020	Fine levied by the stock exchanges	Company has requested for waiver and the same was granted by the BSE and NSE on 25 th January, 2021 and 13 th November, 2020 respectively.
2	BSE/NSE	Delay of 21 days in filing as per Reg. 33 of SEBI (LODR) Regulations, 2015 for the quarter ended 31 st December, 2020	Fine levied by the stock exchanges	Fine levied by the Exchanges and the same was paid by the Company.



(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... <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
There was no such observation in the previous report.				

Place: KOLKATA

Date: 29th June, 2021

For RP & Associates



Ritu Bajaj
(Proprietor)

M.No.: FCS 9913

C.P. No.: 11933

UDIN:

F009913C000544106

