

GTFL:SEC:2021

June 18, 2021

BSE Limited
Corporate Relationship Department,
New Trading Ring,
Rotunda Building, P. J. Towers,
Dalal Street, Fort,
Mumbai 400001. (Company code: 509557)

National Stock Exchange of India Ltd.
Exchange Plaza, Plot No. *C/1*, 'G' Block,
Bandra-Kurla Complex,
Bandra East,
Mumbai 400051. (Symbol: GARFIBRES, Series: EQ)

Dear Sirs,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2021, pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Pursuant to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Garware Technical Fibres Limited for the year ended 31st March, 2021.

Please acknowledge the same.

Thanking you,

Yours faithfully, For GARWARE TECHNICAL FIBRES LIMITED

Sunti Agarwal Company Secretary

M. No. FCS 6407

Encl.: As above



Secretarial compliance report of Garware Technical Fibres Limited (Formerly known as Garware Wall-Ropes Limited) for the year ended 31st March, 2021

To,
Garware Technical Fibres Limited
(Formerly known as Garware Wall- Ropes Limited)
Plot No. 11, Block D-1 MIDC Chinchwad,
Pune-411019.

We SVD & Associates have examined:

- a) all the documents and records made available to us, either physically or by electronic mode in view of the prevailing Pandemic situation of COVID-19 and explanation provided by Garware Technical Fibres 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 ("SEBI(LODR)");
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements)
 Regulations, 2018 (not applicable to the Company during the review Period);
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers)
 Regulations, 2011;
- d) The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (not applicable to the Company during the review Period);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (not applicable to the Company during the review Period);

- g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (not applicable to the Company during the review Period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j) 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; and circulars/ guidelines issued thereunder;

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 matter specified below:-

Sr. No.	Compliance Requirement (Regulations / circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	** Note 1		

- (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.	Action taken by	Details of violation	Details of	action	Observation	ons/ remarks
No.		a a	taken E.g.	fines,	of the	Practicing
			warning	letter,	Company	Secretary, if
			debarment,	etc.	any	~
1	** Note 1					

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

Sr.	Observations of the	Observations	Actions taken by	Comments of the
No.	Practicing Company	made in the	the listed entity, if	Practicing Company
	Secretary in the previous	secretarial	any	Secretary on the actions
	reports	compliance		taken by the listed entity
		report for the		
		year ended(The		
		years are to be		
		mentioned)		
-	Nil	Nil	Nil	Nil

(e) The Company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment/reappointment of statutory auditor of the Company.

** Note 1:

In compliance to requirement under Reg. 13(3) of SEBI (LODR), the Company has uploaded/ filed the statement of investor complaints for the quarter ended September 30, 2020 with BSE Limited within time, i.e. on October 20, 2020, however the said statement could not be uploaded due to technical difficulties faced in filling with The National Stock Exchange of India Limited ("NSE") on October 20, 2020 resulting in delay by one day.

As directed by NSE, the Company paid the fine of Rs. 1,000/- plus applicable taxes under protest and made representation for waiver of fine given facts and circumstances of delay including request for personal hearing. The date of final hearing is awaited.

For SVD & Associates

Company Secretaries

SRIDHAR GOPALKRISHNA MUDALIAR

igitally signed by SRIDHAR OPALKRISHNA MUDALIAR late: 2021.05.27 09:38:00

Sridhar Mudaliar

Partner

FCS No: 6156 C P No: 2664

Place: Pune

Date: May 27, 2021

UDIN: F006156C000360840