

June 20, 2021

To,

BSE Limited

P.J. Towers, Dalal Street,

Mumbai 400 001, India.

Dear Sir/Madam,

Sub: Disclosure regarding request made with SEBI for Relaxation of strict enforcement of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEDI (LODR) Regulations, 2015 & extension of time for filing Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 beyond the time prescribed under Regulation 33(3)(d) of SEBI (LODR) Regulation, 2015 read with Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021

With reference to above subject we humbly wish to inform that the Company has filed an application on June 19, 2021 under Regulation 102 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for relaxation of strict enforcement of Regulation 33 & extension of time for filing Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 beyond the time prescribed under Regulation 33(3)(d) of SEBI (LODR) Regulation, 2015 read with Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 by 15 days (ie. by July 15, 2021).

The application has been filed in the backdrop of difficulties on account of COVID 19 pandemic. The operations of the Company are located in Lucknow in the state of Uttar Pradesh, which has been one of the most affected places in the second wave of COVID 19 pandemic and as many as 111 employees/families in its grip & several employees and their family members lost their lives. As the finance and accounts department was majorly impacted, the finalization and audit of annual financial results for the quarter and the year ended at March 31, 2021 has also got delayed.



The copy of application filed is attached herewith for your reference.

We humbly request you to kindly take the above on your records.

With regards,

Yours faithfully,

For PTC Industries Limited,



Smita Agarwal

Director and CFO

DIN - 00276903

Encl: As above

June 16, 2021

To,

Mr. Amy Durga Menon
Deputy General Manager
Compliance and Monitoring Division
Corporation Finance Department
Securities & Exchange Board of India
SEBI Bhavan, Plot No. C-4A, G Block,
Bandra Kurla Complex, Bandra (East) Mumbai 400051
Email - amydurga@sebi.gov.in

Dear Sir/Madam,

Sub: Request for Relaxation of strict enforcement of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEDI (LODR) Regulations, 2015 - Request for extension of time for filing Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 beyond the time prescribed under Regulation 33(3)(d) of SEBI (LODR) Regulation, 2015 read with Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021

With reference to above subject we humbly submit the following:

1. BACK GROUND

1.1 PTC Industries Limited ("PTCIL") is a Company incorporated under Companies Act, 1956, with CIN 27109UP1963PLC002931, having its registered Office at NH 25A, Sarai Shahjadi, Lucknow 227 101 Uttar Pradesh, India. PTC Industries Limited ("The Company") is Listed in BSE Limited (with Scrip Code : 539006) with Listed capital of Rs.5,23,90,630 comprising 52,39,063 Equity Shares of Rs. 10/- each. The Company is one of the world's leading suppliers of high precision metal components for critical and super-critical applications.

1.2 As on date the Promoter & Promoter Group hold 35,49,750 (about 67.76%) equity shares of Rs. 10/- each.



1.3 The Company has one wholly owned subsidiary – Aerolloy Technologies Limited (ATL), dedicated to the development of in-house capabilities for manufacture of metal components for aerospace, defence and allied industries.

2. COMPLIANCE UNDER REGULATION 33 OF SEBI (LODR) REGULATIONS, 2015

2.1 In terms of Regulation 33(3) of the SEBI (LODR) Regulations, 2015, the company is obligated to submit and/or publish the audited financial results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 within sixty days from the close of the financial year (ie. by May 30, 2021).

2.2 In view of COVID 19 pandemic, SEBI relaxed the compliances under SEBI (LODR) Regulations, 2015 including the time line to submit and/or publish the audited financial results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 to June 30, 2021.

3. RELXATION PROPOSED

3.1 The Company seeks Relaxation of strict enforcement of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and request for extension of time by fifteen days (ie. by July 15, 2021) for filing Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 beyond the time prescribed under Regulation 33(3)(d) of SEBI (LODR) Regulation, 2015 read with Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 (ie. June 30, 2021).

4. REASONS FOR SEEKING RELAXATION

4.1 The operations of the Company are located in Lucknow in the state of Uttar Pradesh, which has been one of the most affected places in the second wave of COVID 19 pandemic.

4.2 The Company's biggest priority in dealing with this crisis has been to protect the health and safety of our employees, whilst remaining mindful of our obligation towards our customers and maintaining business continuity.

4.3 Despite taking best precautions and making best efforts, the second wave of the pandemic has taken as many as 111 employees/families in its grip and large number of their extended family members have also got infected. Details attached as **Annexure – I** for reference.



- 4.4 We have lost the lives of several employees and their family members.
- 4.5 As the finance and accounts department was majorly impacted, the finalization and audit of annual financial results for the quarter and the year ended at March 31, 2021 has also got delayed.
- 4.6 Though lockdown curfew has been relaxed in Lucknow, but the severe impact on the families of the employees is still a bottleneck in bringing things back on track in the accounts team.
- 4.7 We have been making our best efforts to finalise the accounts and get the same audited by June 30, 2021, but it seems impossible now.
- 4.8 Accordingly, we are constrained to file this application for seeking Relaxation of strict enforcement of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 4.9 We most humbly request for extension of time by fifteen days (ie. by July 15, 2021) for filing Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021 beyond the time prescribed under Regulation 33(3)(d) of SEBI (LODR) Regulation, 2015 read with Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 (ie. June 30, 2021).
- 4.10 Please appreciate that this is first time the Company is constrained to reach out you for seeking relaxation from strict enforcement of any Regulation of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and that is purely on account of things beyond the control of the Company and its management.

5. POWERS OF SEBI

- 5.1 Regulation 102 of the Listing Regulation empower the Securities Exchange Board of India (SEBI) to relax the strict applicability or enforcement of the Listing Regulations in the interest of investors and Securities market and for the development of securities market, subject to SEBI being satisfied of certain conditions.
- 5.2 These conditions include the strict requirement may cause undue hardship to the company's investors, or the disclosure requirement is not relevant for a particular industry or class of entities or class of listed entities, or the requirement is technical in nature or the non-compliances was caused due to factors beyond the control of the entities.



Based on the above facts and submissions, the Company despite making its best efforts is not able to finalise annual financial results by June 30, 2021 and in backdrop of circumstances beyond its control, the Company humbly requests the SEBI for an extension of time for filing of Audited Financial Results (both Standalone and Consolidated) for the quarter and financial year ended March 31, 2021. The Company will submit the same by **July 15, 2021**.

It is submitted that the Company's track record in complying with the rules and regulations issued by the SEBI, at all points of time is unblemished and the Company has, over the years, maintained the high standards of transparency and Corporate Governance.

All material facts, circumstances and legal provisions which, in our opinion are relevant for the purposes of determination of this request are stated herein and the Company is pleased to furnish any additional information as may be required in support of this application. In case if any further information is required, it may be addressed to the undersigned.

With respect to our application under Regulation 102 of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, we have paid the fees of Rs. 1,00,000/- (Rupees One Lakh Only) through NEFT Vide Bank Refence No. N168211536204935. Payment details are enclosed as **Annexure- II**.

We look forward for the needful. We request you to kindly acknowledge the receipt of this application.

With regards,

Yours faithfully,

For PTC Industries Limited,


Smita Agarwal

Director and CFO

DIN - 00276903

Copies To:

<p>Smt. Madhabi Puri Buch Whole time Member Securities and Exchange Board of India SEBI Bhavan, Plot No. C-4A, G Block, Bandra Kurla Complex, Bandra (East) Mumbai 400051. Email - madhabi.buch@sebi.gov.in</p>	<p>Ms. Barnali Mukherjee Chief General Manager Compliance and Monitoring Division Corporation Finance Department Securities & Exchange Board of India SEBI Bhavan, Plot No. C-4A, G Block, Bandra Kurla Complex, Bandra (East) Mumbai 400051 Email - barnalim@sebi.gov.in</p>
<p>Shri Girish Joshi Chief Trading Operations and Listing Sales BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai- 400001 Email - girish.joshi@bseindia.com</p>	



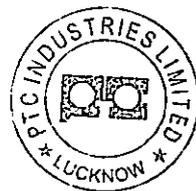
Annexure - I

List of COVID 19 affected Persons of PTC Industries Limited

Sr.No	Month	Empl Code	EmpName	Category Name	Department
1	April	1190	Aditya Shukla - Father	Relative	Customer Support
2	April	1190	Aditya Shukla - Mother	Relative	Customer Support
3	April	868	Rohit Agarwal - Brother Inlaw	Relative	Machine Shop
5	April	970	Vijay Kumar Jaiswal	Staff	Export Import
6	April	270	Vishwa Nath Sharma	Worker	Fettling
7	April	777	Abhishek Kumar	Worker	Machine Shop
8	April	890	Vaibhav Dubey	Staff	Product and Process Development
9	April	455	Maninder Singh Punn	Staff	Product and Process Development
10	April	1022	Subhash Singh Yadav	Worker	Machine Shop
11	April	ATL00032	Ayodhya Sharma	Worker	Titanium
12	April	ATL00040	Janardan Kharwar	Worker	Titanium
13	April	974	Mohd Arshad	Staff	Machine Shop
14	April	493	Madan Lal Saini (need RT PCR Test)	Workmen	Machine Shop
15	April	473	Suresh Mishra	Workmen	Purchase and Store
16	April	1174	Manoj Kumar	Workmen	Machine Shop
17	May	1209	Kashi Nath Yadav	Staff	Finance & Account
18	May	1209	Kashi Nath Yadav Daughter	Relative	Finance & Account
19	April	977	Saloni Srivastava	Staff	Quality
20	April	1041	Vaibhav Srivastava	Staff	Customer Support
21	April	984	Amit Kumar	Staff	Admin
22	April	670	Santosh Kumar Pathak (need RT PCR Test)	Workmen	Machine Shop
23	April	1025	Manish Kumar	Workmen	Machine Shop
24	May	ATL00004	Amit Khare - Wife	Relative	Titanium
25	April	1041	Vaibhav Srivastava - Mother	Relative	Customer Support
26	April	533	Vinay Gola (Ravi) Wife	Relative	IT
27	April	1030	Surendra Singh	Worker	Machine Shop
28	April	T0001	Radhey Shyam	Worker	Radiography
29	April	1169	Rizwan Ali	Worker	Machine Shop
30	April	IT3	Arun Kashyap	Casual Workmen	Radiography
31	April	Temp1	Ram Kumar Mishra	MD House	House Keeping
32	April	Temp2	Ram Shevak Srivastava	MD House	House Keeping
33	April	22000234	Ravi Prakash	Workmen - Contractor	Foundry
34	April	Sam.01	Rahul Kashyap	Workmen - Contractor	Foundry
35	April	973	Girish Chandra Bhatt	Staff	Machine Shop
36	April	TR000857	Ankur Sinha	Trainee	Customer Support
37	April	815	Suresh Kumar	Workmen	Pre-Cast
38	April	484	Kamal Srivastava	Staff	Export Import
39	April	484	Komal Srivastava - Mother	Relative	Export Import
40	April	ATL00015	Ajay Pandey - Mother	Relative	PPD
42	April	458	Reshma Gaur	Staff	Exim
43	April	957	Shubham Verma	Staff	Customer Support Services
44	April	1037	Abhishek Rathore	Staff	Maintenance
45	April	1037	Abhishek Rathore - Wife	Relative	Maintenance
47	April	745	Mridul Shukla	Staff	Machine Shop
48	April	745	Mridul Shukla - Wife	Relative	Machine Shop
49	April	745	Mridul Shukla - Father	Relative	Machine Shop
50	April	885	BB Sinha (Father of Ankur Sinha)	Staff	Foundry
51	April	885	Ankur Sinha - Mother	Relative	Foundry
52	April	885	Ankur Sinha - Sister Pooja Sinha	Relative	Foundry
53	April	144	K K Jaiswal	Staff	IT
54	April	144	K K Jaiswal Wife	Relative	IT
55	April	144	K K Jaiswal - Daughter Manjari	Relative	IT



56	April	144	K K Jaiswal - Son - Divyansh Jaiswal	Relative	IT
57	April	Driver 7	Vivek Driver	Worker	Admin
58	April	391	Rajesh Sahu	Staff	Purchase Department
59	May	152	Vijay Prasad	Staff	Foundry
60	May	458	Reshma Gaur - Husband		Exim
62	May	828	Nirbhay Trivedi	Staff	Finance & Account
63	May	828	Nirbhay Wife Ankita Trivedi	Relative	Finance & Account
64	May	828	Nirbhay Sister Anjali Trivedi	Relative	Finance & Account
65	April	828	Nirbhay - Abhay Trivedi	Relative	Finance & Account
66	May	ATL00016	Neeraj Kumar Sharma	Workmen	Titanium
67	May	ATL00016	Neeraj Kumar Sharma - Father	Relative	Titanium
68	May	1043	Brijnandan	Staff	Finance & Account
69	May	1043	Brijnandan - Wife	Relative	Finance & Account
70	April	1100	Manish Kumar Srivastava	Staff	Customer Support
71	April	1100	Manish - Wife	Relative	Customer Support
72	April	1100	Manish - Father	Relative	Customer Support
73	April	1100	Manish - Brother	Relative	Customer Support
74	April	460	Saurabh Mishra	Staff	Planning
75	May	460	Saurabh Mishra - Father	Relative	Planning
76	May	460	Saurabh Mishra - Mother	Relative	Planning
77	May	823	VIPIN KUMAR Agrawal	Staff	EXIM
78	April	254	Hemant Rajput	Staff	Finance & Account
79	April	254	Hemant Rajput - Daughter Vaanya	Relative	Finance & Account
80	April	254	Hemant Rajput - Daughter Aishwarya	Relative	Finance & Account
81	April	254	Hemant Rajput - Wife Madhur	Relative	Finance & Account
82	April	333	Nokh Ram	Workmen	Packing and Dispatch
83	April	805	Akhilesh Kumar	Workmen	Foundry
84	April	715	Amar Nath Gautam	Workmen	Machine Shop
85	April	ATLIR007	Nikesh Kumar Rai	Trainee	Titanium
86	April	ATL00005	Bipin Kumar Sharma	Staff	Titanium
87	April	Driver4	Vikash Kumar Yadav	Workmen	Admin
88	April	1023	Nirmal Kumar	Workmen	Machine Shop
89	April	ATL00016	Neeraj Kumar Sharma	Workmen	Titanium
90	April	ATL00047	Manish Sharma	Workmen	Titanium
91	April	870	Dinesh Verma - Aunty	Workmen	Foundry
92	April	ATL00050	Veeru Yadav	Workmen	Titanium
93	April	324	Dilip Singh	Workmen	Fabrication
94	April	ATL00042	Rajesh Mishra	Workmen	Titanium
95	April	ATL00007	Aditya Pratap Singh	Staff	Titanium
96	May	597	Ravindra Soni - Wife	Workmen	Quality
97	May	964	Madhup Sharma - Mother	Relative	HR
101	May	222	Satish Mishra - Father	Relative	Fettling
102	May	222	Satish Mishra - Mother	Relative	Fettling
103	May	Casual	Chand - Mother (Contr. Brij Kishore)	Relative	Vendor Shop
104	May	Casual	Abbrar - Mother (Contr. Brij Kishore)	Relative	Titanium
105	May	1083	Rahul Kumar	Staff	Finance & Account
106	May	964	Madhup Sharma - Elder Daughter	Relative	HR
107	May	1179	Vipul Kumar Gupta - Wife	Relative	Quality
108	May	TR000850	Suyash Tiwan - Father	Relative	Quality
109	May	TR000850	Suyash Tiwan - Mother	Relative	Quality
110	May	1036	Deepak Kumar Das - Elder Brother	Relative	Quality
111	May	235	Ravi Shankar - Mother	Relative	Packing and Dispatch



List of Casualties due to COVID 19

Sr.No	Month	Empl Code	EmpName	Category Name	Department	Current Status
1	April	360	Rajesh Singh	Employee	HR	Expired
4	April	828	Nirbhay - Father	Relative	FIRST	Expired
41	May	207	Raj Kishore Yadav - Wife	Relative	Foundry	Expired
46	April	1037	Abhishek Rathore - Aunty	Relative	Maintenance	Expired
61	April	458	Reshma Gaur - Mother	Relative	Exim	Expired
98	April	TR000851	Harsh Gangwar - Father	Relative	Quality	Expired
99	May	205	Arvind Kumar - Mother	Relative	Project	Expired
100	April	197	Chandra Deo Bharti - Wife	Relative	Foundry	Expired



SinglePayment Details

Payment Details			
Order Party	PTC INDUSTRIES LTD 0070/3911 BR		
Branch	TEKARI CHAMBERS		
Debit A/C	12670330000070		
Beneficiary Details			
Beneficiary Code	SECURITIES AND EXCHANGE BOARD OF IN		
Beneficiary Name	SECURITIES AND EXCHANGE BOARD OF IN		
IFSC Code	BKID0000122	Branch	BANDRA KURLA COMP
A/c	012210210000007	Bank	BANK OF INDIA
Amount Details			
Amount	100000	Currency	INR
Value Date	17/06/2021 00:00	Debit Narration	SECURITIES AND EXCHANGE
Payment Mode	NEFT	Credit Narration	FT106165276908
Bank Refence	N168211536204935	Enet Reference	FT106165276908
Reason			
UTR No.			
Remitter Email Id			
Authorization Details			
Last Inputted By	YADAV	Last Updated	16/06/2021 20:41
First Authorizer	SMITAAUTH	Second Authorizer	-
Status	E	Created Date and Time	16/06/2021 02:29:34

Smिता अग्रवाल

