



INDUCTO
STEEL LTD

May 30, 2022

To,
BSE Limited
Corporate Relations Department,
PhirozeJeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

Scrip Code: 532001
Script Name: INDCTST
ISIN: INE146H01018

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2022
Ref: Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations")

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI Listing Regulations and SEBI Circular CIR/CED/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2022.

The above is for your information and record.

Thanking You,

Yours faithfully,
For **INDUCTO STEEL LIMITED**

RAJEEV SHANTISARUP RENIWAL
MANAGING DIRECTOR
(DIN: 00034264)

Note: Pursuant to SEBI Circular No .SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021, this intimation is being submitted with Digital Signature.

ANNUAL SECRETARIAL COMPLIANCE REPORT OF
INDUCTO STEEL LIMITED FOR THE YEAR ENDED MARCH 31, 2022

To,
The Board of Directors,
Inducto Steel Limited,
156, Maker Chambers VI,
220 Jamnalal Bajaj Marg,
Nariman Point,
Mumbai-400021

We have conducted the Annual Secretarial Compliance Audit of Inducto Steel Limited (*hereinafter referred to as "the Company"*) in terms of compliance with Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We, have examined all the:

- a) documents and records made available to us and explanation provided by the Company;
- b) the filings/ submissions made by the Company with Securities and Exchange Board of India ("SEBI") and the Stock Exchanges;
- c) other relevant documents/ filings,
- d) content on the website of the Company;

for the year ended March 31, 2022 ("*Review Period*") in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 and the Regulations, circulars, guidelines issued thereunder; and
- b) the Securities Contracts (Regulation) Act, 1956, rules made thereunder and the Regulations, circulars, guidelines issued thereunder by SEBI.

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (*Not Applicable to the Company during the Review Period*);
- c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- e) SEBI (Depositories and Participants) Regulations, 2018;

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Admin. Office: 434, Neo Corporate Plaza, Opp. Gopal Bhawan, Kanchpada Link Road, Malad West,
Mumbai 400 064. website: www.csdilip.com

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- f) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client;
- g) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not Applicable to the Company during the Review Period);
- h) SEBI (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company during the Review Period);
- i) SEBI (Buyback of Securities) Regulations, 2018 (Not applicable to the Company during the Review Period);
- j) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (Not applicable to the Company during the Review Period).

Based on the above examination, we hereby report that, during the Review Period, the Company has:

- a) complied with all the applicable provisions of the above Regulations and circulars/guidelines issued thereunder except with 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 33 and Regulation 30 read with Schedule III of the Part A of SEBI (Listing Obligations and Disclosure Requirement) Regulation, 2015 - Listed Company shall disclose the information within 30 minutes of conclusion of the meeting of Board of Directors.	There was a delay in submitting the Consolidated Limited Review Report ('LRR') along with financial results for quarter ended December 31, 2020	We were informed that the Company had submitted wrong LRR along with financial results within 30 minutes of the conclusion of meeting of Board of Directors. On being notified by Stock exchange, Company immediately submitted rectified LRR. The Company approached BSE Limited for waiver of fine imposed for the said delay, which was repudiated.

- b) maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder, to the extent applicable.

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- 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.	Bombay Stock Exchange	Regulation 33 and Regulation 30 read with Schedule III of the Part A of SEBI (Listing Obligations and Disclosure Requirement) Regulation, 2015 - Listed Company shall disclose the information within 30 minutes of conclusion of the meeting of Board of Directors.	A fine of Rs. 11, 800/- (including GST @18%) was imposed by BSE Limited. The Company had made a representation for waiver of fines imposed and the same was repudiated. The Company has paid the fine on November 18, 2021.	The Company has paid the fine and ensured to take all possible measures so as to avoid subsequent non-compliance.

We further confirm that the Secretarial Compliance Report for the previous year dated June 29, 2021 was clean and unqualified.

For DILIP BHARADIYA & ASSOCIATES



DILIP BHARADIYA
Partner
FCS No. 7956, C P No. 6740
UDIN: F007956D000425021



Place: Mumbai
Date: May 30, 2022