



KAMLESH M. SHAH & CO.

B COM LL B ACS

Since - 1993
PEER REVIEWED

PRACTICING COMPANY SECRETARY

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SECRETARIAL COMPLIANCE REPORT
OF SHAH ALLOYS LIMITED FOR THE YEAR ENDED MARCH 31, 2022

(Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

I Kamlesh M. Shah have examined;

- all the documents and records made available to us and explanation provided by **SHAH ALLOYS LIMITED** (CIN: L27100GJ1990PLC014698) ("the listed entity");
- the filings / submissions made by the listed entity to the stock exchanges;
- website of the listed entity; and
- any other document / filing, as may be relevant, which has been relied upon to make this certification,

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

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (**Not Applicable for the year under report**)
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not Applicable for the year under report**)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not Applicable for the year under report**)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not Applicable for the year under report**)
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not Applicable for the year under report**)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; (**Not Applicable for the year under report**).

and circulars / guidelines issued thereunder and based on the above examination, I hereby report that, during the period under report:

- 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 23 (9)	Delayed compliance with disclosure of related party transactions on consolidated basis.	Based on the clarification from the company there was an inadvertent delay in submission of the disclosure due to ongoing Income Tax search in the Company. Stock Exchange has levied the penalty and the same is paid by Company.

- (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 my 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	Stock Exchange	Regulation 23 (9) Delayed compliance with disclosure of related party transactions on consolidated basis.	Fine levied by Stock Exchange	Based on the clarification from the company there was an inadvertent delay in submission of the disclosure due to ongoing Income Tax search in the Company. Stock Exchange has levied the penalty and the same is paid by 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 March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For Kamlesh M. Shah & Co.,
Practicing Company Secretary

Place: Ahmedabad
Date: May 26, 2022



Kamlesh M. Shah

Kamlesh M. Shah
(Proprietor)
(ACS: 8356, COP: 2072)
UDIN: A008356D000394126