



SCAN STEELS LTD.

CIN : L27209MH1994PLC076015 | GSTIN : 21AABCM6734H1ZQ

+91 80931 15221

+91 90781 85221

scansteels@scansteels.com

www.scansteels.com



Dt. 11th May, 2024

To,
The General Manager
DCS – Corporate Relationship Department
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400 001.

Scrip Code – 511672.

Sub.: Submission of Annual Secretarial Compliance Report for the Year ended on 31st March, 2024.

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 read with SEBI Circular No. CIR/ CFD/ CMD1/ 27/2019 dated February 8, 2019 as amended, please find enclosed here with Annual Secretarial Compliance Report issued by M/s. Amarendra Mohapatra & Associates, Prop. CS Amarendra Mohapatra, Practicing Company Secretary for the Year ended on 31st March, 2024 for your kind perusal and record.

Please acknowledge and take on record the same.

Thanking you,
Yours Faithfully,
For Scan Steels Limited

PRABIR
KUMAR
DAS
Digitally signed
by PRABIR
KUMAR DAS
Date: 2024.05.11
19:22:32 +05'30'

Prabir Kumar Das
(President & Company Secretary)
Encl: As Above



Corporate Office : Trishna Nirmalya
Plot No. 516/1723/3991, 3rd Floor
Patia, Bhubaneswar-751024

Registered Office : Office No. 104, 105, E-Square
Subhash Road, Vile Parle (East), Mumbai-400057
Phone : +91-02226185461, +91-02226185462





C.S. Amarendra Mohapatra
M. Com, L.L.M., A.C.S.

***Amarendra Mohapatra & Associates**
Practicing Company Secretaries*
PH: +91 9004886465 & +917873117777

SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024

(Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015)

To,
SCAN STEELS LIMITED
104-105, "E-Square"
Subhash Road,
Opp. Havmor ice- cream,
Vile- Parle (E),
Mumbai – 400057.

I/We CS Amarendra Mohapatra, Prop. of M/s. Amarendra Mohapatra & Associates, have examined:

- All the documents and records made available to me and explanation provided by [SCAN STEELS LIMITED] ("the listed entity"),
- The filings/submissions made by the listed entity to the stock exchanges,
- The Website of the listed entity,
- All other document/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended [31.03.2024] ("Review 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 there under; and
- The securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations (including amendments, modifications from time to time), whose provisions and the circulars/guidelines issued there under, have been examined, include: -

- Securities and Exchange Board of India (listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments from time to time; to the extent applicable;
- Securities and Exchange Board of India (Issued of Capital and Disclosure Requirement) Regulations, 2018; and amendments from time to time; to the extent applicable;
- Securities and Exchange Board of India (Substantial Acquisition of shares and Takeovers) Regulations, 2011 to the extent applicable;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
(Not Applicable to the company during the audit period)
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulation, 2021**(Not Applicable to the Company during the audit period)**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
(Not Applicable to the Company during the audit period)

* House No.56/1, MIG-II, Phase-I, Chandrasekharapur Housing Board
Colony CS, Pur, Bhubaneswar, Odisha- 751016.
Mumbai Office: 129B, Ansa Industrial Estate, Saki Vihar Road, Sakinaka,
Andheri East, Mumbai - 400072
E-Mail: Associateconsultancy@Gmail.Com & Csamarendra@Gmail.Com*



- (g) Securities and Exchange Board of India (Prohibition of insider Trading) Regulations, 2015; to the extent applicable
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
(Not Applicable to the company during the audit period);
- (i) 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;
- (j) SEBI (Depositories and Participant) Regulations, 2018; to the extent applicable.
- (k) Foreign Exchange Management Act, 1999 and the Rules and Regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
(Not Applicable to the company during the audit period);

and circulars/ guidelines issued thereunder;

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 ~~and~~ thereunder, except in respect of matters specified below: - **Not Applicable**

Sr. No.	Compliance Requirement (Regulation/ circulars/ Guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
					Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.					
NIL										

- (b) The listed entity has taken the following actions to comply with the observations made in previous reports: - **Not Applicable**

Sr. No.	Compliance Requirement (Regulations/ circulars/ Guidelines including Specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
					Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.					
Not Applicable										



Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations Remarks by PCS*
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes	
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s) / section of the website 	Yes	
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	The Company does not have any Subsidiaries



Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations Remarks by PCS*
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the Financial Year as prescribed in SEBI Regulations	Yes	
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee	Yes	
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	Yes	No action is taken against the Company/ its promoters/ directors/ either by SEBI or by Stock Exchanges during the Period under Review
12.	<u>Additional Non-compliances, if any:</u> No. of any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	No additional non-compliance observed for all SEBI regulation/circular/guidance note etc. during the Period under Review

NOTE: Compliances related to resignation of statutory auditors from the company and its material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019 is not applicable to company during the review period hence, details about the same is not included in the said report.



Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For Amarendra Mohapatra & Associates
Practicing Company Secretary**



**CS Amarendra Mohapatra
Proprietor
Membership No. A26257, C.P. No. 14901
UDIN: A026257F000328405
PR No. 1880/2022**

Date:11/05/2024, Place: Bhubaneswar