



Prakash Steelage Ltd.

MANUFACTURER OF STAINLESS STEEL WELDED PIPES, TUBES & U-TUBES
An ISO 9001-2008, ISO 14001-2004, OHSAS 18001-2007, PED Certified Company

May 29, 2022

To,
The Manager,
BSE Limited
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

To,
The Manager,
National Stock Exchange of India Limited
Listing & Compliance Department,
Exchange Plaza, Bandra - Kurla Complex,
Bandra (E), Mumbai – 400 051.

Scrip Code: 533239 (BSE); PRAKASHSTL (NSE)

Sub.: Annual Secretarial Compliance Report for the year ended March 31, 2022.

Ref.: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019

Sir/ Madam,

In terms of Clause 3(b)(iii) of the above referred SEBI circular, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2022, issued by Mr. Dinesh Trivedi, (Designated Partner of S. Anantha & Ved LLP) Practicing Company Secretary and the Secretarial Auditor of the Company.

This is for your information and records.

Thanking you,

Yours faithfully,
For **Prakash Steelage Limited**

Smita Singh
Company Secretary & Compliance Officer



**Secretarial compliance report of Prakash Steelage Limited for the Financial Year ended
March 31, 2022**

{Pursuant to regulation 3(b) of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 under the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015}

We, M/s. S. Anantha & Ved LLP, (AAH-8229) Company Secretaries, Mumbai have examined:

- (a) all the documents and records made available to us and explanation provided by **Prakash Steelage Limited** having CIN: L27106MH1991PLC061595(the “**listed entity**”);
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity (website address: <https://www.prakashsteelage.com>); and
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the Financial 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 (“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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018(**Not Applicable**, as there was no instance during the year under review);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018(**Not Applicable**, as there was no instance during the year under review);

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (applicable upto 12th August, 2021 vide Notification No.: SEBI/LAD-NRO/GN/2021/40) and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (applicable w.e.f. from 13th August, 2021 vide Notification No.: SEBI/LAD-NRO/GN/2021/40); (**Not Applicable**, as there was no instance during the year under review);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not Applicable**, as there was no instance during the year under review);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (**Not Applicable**, as there was no instance during the year under review);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018; and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the financial year ended 31st March, 2022:

- a. 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
NIL			

- 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/our examination of those records.
- c. There were No 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 in so far as it appears from our examination of those records.
- 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 31 st March, 2021	Actions taken by the entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Prior approval from the members of the Company in terms of Regulation 23 of SEBI LODR 2015 is not availed with respect to material related party transactions entered by the Company with related party(ies), during Financial Year 2019-20.	Due to Covid-19,Pandemic, the Notes on audited Related Party Transactions information was received after 30 th June, 2020, hence the observation was not reported in the previous report (SCR)	The Company proposed to avail the approval in the ensuing Annual General Meeting to be held on or before 30 th September, 2021.	Company has obtained approval for the same from shareholders of the Company at the AGM held on September 28, 2021

**For S. Anantha & Ved LLP
Company Secretaries**

DINESH
HARISHANKA
R TRIVEDI

Digitally signed by
DINESH HARISHANKAR
TRIVEDI
Date: 2022.05.28
19:35:11 +05'30'

Dinesh Trivedi
Designated Partner
Membership No.: A23841
CP No.: 22407
UDIN: A023841D000420853

Date: 28th May, 2022
Place: Mumbai