

June 29, 2021

To  
The Manager  
The Department of Corporate Services  
BSE Limited  
Floor 25, P. J. Towers,  
Dalai Street, Mumbai — 400 001

**Scrip Code: 531147**

To  
The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai — 400 051

**Scrip Symbol: ALICON**

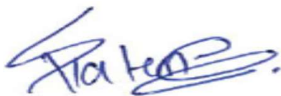
**Sub: Annual Secretarial Compliance Report for the year ended on March 31, 2020.**

Sir/ Madam,

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Secretarial Compliance Report of Alicon Castalloy Limited for the Year ended March 31, 2021 issued by Mr. Upendra Shukla, Practicing Company Secretary, Mumbai.

Kindly take this information on your record.

Thanking you,  
Yours faithfully,  
For **Alicon Castalloy Ltd,**

A handwritten signature in blue ink, appearing to read 'Swapnal Patane', with a flourish at the end.

**Swapnal Patane**  
**Company Secretary**  
**M No.: ACS27424**

**UPENDRA SHUKLA**

*B. Com., F C. S*

*Company Secretary*

504, Navkar,  
Nandapatkar Road,  
Vile Parle East, Mumbai - 400 057  
Resi : 2611 8257  
Mob.: 98211 25846  
E-mail : [ucshukla@rediffmail.com](mailto:ucshukla@rediffmail.com)

29<sup>th</sup> June, 2021

To,

The Board of Directors  
Alicon Castalloy Limited  
Survey No 1426  
Village Shikrapur  
Taluka - Shirur  
Pune-412208

Dear Sir,

**Annual Secretarial Compliance Report for the Financial Year 2020-21**

I have been engaged by Alicon Castalloy Limited (hereinafter referred to as 'the Company') bearing CIN: **L99999PN1990PLC059487**, whose Equity Shares are listed on the BSE Ltd (Security Code **531147**) and National Stock Exchange of India Ltd (Symbol **ALICON**), to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 and to issue the Annual Secretarial Compliance Report thereon. **For the purpose of issuing this Report, I have conducted online verification & examination of records, as facilitated by the Company, due to Covid 19 and subsequent lockdown.**

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all the applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued thereunder from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report, issued by the Institute of Company Secretaries of India and in a manner which involves such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

Thanking you,

Yours faithfully,

Upendra  
Chandrashankar  
Shukla  
(UPENDRA C. SHUKLA)  
COMPANY SECRETARY  
FCS: 2727/CP No: 1654

Digitally signed by Upendra Chandrashankar Shukla  
DN: cn=Upendra, email=ucshukla@rediffmail.com, postalCode=400057,  
serialNumber=152660348899444434822465585ccf  
071816121081, c=India, o=Upendra  
Chandrashankar Shukla  
Date: 2021.06.29 12:56:51 +05'30'

SECRETARIAL COMPLIANCE REPORT  
OF  
ALICON CASTALLOY LIMITED  
FOR THE YEAR ENDED 31.03.2021

I have examined:

- (a) All the documents and records made available to me and explanation provided by Alicon Castalloy Limited (“the listed entity”);
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the year ended 31<sup>st</sup> March, 2021 (“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 since there was no reportable event 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 since there was no reportable event during the year under review**];

Upendra  
Chandrash  
nkar Shukla

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Chandrashnkar Shukla  
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Date: 2021.06.29 12:10:13 +05'30'

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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)	a) BSE Limited b) National Stock Exchange of India Limited (NSE)	Regulation 23(9)	The Company has received an e-mail dated 18/01/2021 from NSE Ltd. and BSE Ltd., levying penalty for non-compliance of the provisions of Reg. 23(9) of SEBI (LODR) Regulations, 2015 [for Non-Compliance with Disclosure of Related Party Transactions on consolidated basis within prescribed time]	NSE & BSE has waived off the penalty vide letter dated 20/05/2021 and 25/06/2021 respectively.

(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable since no action was required to be taken by the listed entity				

UDIN: F002727C000534687  
Place: MUMBAI  
Date: 29/06/2021

Upendra  
Chandrashan  
kar Shukla  
(UPENDRA C. SHUKLA)  
COMPANY SECRETARY  
FCS: 2727/CP No: 1654

Digitally signed by Upendra  
Chandrashankar Shukla  
DN: c=N, o=Personal, title=2366,  
pseudonym=bcf62e56c6330c2013f488ee8f  
da9793a898ba4154029415046980d1e1329  
86a, postalCode=400057, st=Maharashtra,  
serialNumber=c75db60fac448f89f44aca34  
822465585cc0cf1f853c35208134adaacde1  
76, cn=Upendra Chandrashankar Shukla  
Date: 2021.06.29 12:10:44 +05'30'