

To,
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

Dt: 29.04.2021

Scrip Code:540080

Sub: Annual Secretarial Compliance Report for the year ended 31st March,2021

Dear Sir/Madam,

With reference to caption subject, we attached herewith the Annual Secretarial Compliance Report for the year ended 31st March,2021

Kindly acknowledge the receipt

For Narayani Steels Limited.

Arun Kumar Meher .

Arun Kumar Meher.
Company Scretary.

Issued with approval of Mr. Krishna Komaravolu
Resolution Professional for Narayani Steels Limited.



Steel



Coal



Minerals



Import



Export



Logistics



Warehousing



Agriculture



Brokerage



Gopinath Nayak & Associates
COMPANY SECRETARIES

**Secretarial Compliance Report of
M/s Narayani Steels Limited (L27109WB1996PLC082021) for the year
ended 31.03.2021**

I Bharat Chandra Das, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Narayani Steels Limited (L27109WB1996PLC082021),
- (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 31.03.2021 ("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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (e) Securities Exchange Board of India (Registrar to an Issue and Share Transfer Agent) Regulations, 1993

and circulars/ guidelines issued thereunder; and based on the above examination, I hereby report that, during the Review Period:

- (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
01	Regulation 46 of SEBI (LODR), Regulations, 2015	Company website is not working properly and it is temporarily closed.	Company has advised to open its website as soon as possible in order to comply the provisions.

(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.
NIL	NIL	NIL	NIL	NIL
NIL	NIL	NIL	NIL	NIL

(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 2020 (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
01	Company needs to Appoint New Independent Director in place of Mr Atul Kumar Saxena who demised in the month of February, 2020	Due to demise of One Independent Director Mr Atul Saxena, No New Independent Director was appointed as time limit was there	Company appointed Independent Director	Company appointed Independent Director.

Place: Bhubaneswar
Date: 29.04.2021




Bharat Chandra Das
Practicing Company Secretary
ACS No.: A25843
C P No.: 9834
UDIN- A025843C000209752