

Date: 16th May, 2022

<p>To, The Manager, Listing & Compliance, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001.</p> <p><u>Ref: Scrip Code - 540393</u></p>	<p>To, Listing Department, National Stock Exchange of India Limited, C-1, G-Block, Bandra-Kurla Complex Bandra (E), Mumbai - 400 051</p> <p><u>Ref: Scrip Symbol - SMLT</u></p>
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Sub: Annual Secretarial Compliance Report for the year ended 31st March 2022.

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 08th February, 2019 please find enclosed herewith the copy of the Annual Secretarial Compliance Report issued by M/S NILESH A PRADHAN & CO., LLP Practicing Company Secretary, for the year ended on March 31, 2022.

Kindly take the above Certificate on your records.

Thanking You,

Yours faithfully,

For, Sarthak Metals Limited



Pratik Jain

Company Secretary & Compliance Officer

Encl. as above

NILESH A. PRADHAN & CO., LLP

Company Secretaries

Secretarial Compliance Report of Sarthak Metals Limited for the year ended 31st March, 2022

We, Nilesh A. Pradhan & Co., LLP have examined:

- (a) all the documents and records made available to us and explanation provided by Sarthak Metals 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 31st March, 2022 in respect of compliance with the provisions of :

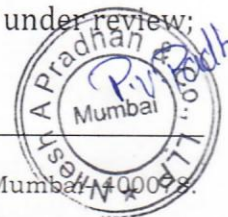
- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities 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;
- (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 reportable event during the financial year under review;

LLP Identity No. AAN-6938

B-201, Pratik Industrial Estate, Near Fortis Hospital, Mulund-Goregaon Link Road, Mumbai - 400088.
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(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable as there was no reportable event during the financial year under review

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; -Not Applicable as there was no reportable event during the financial 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 reportable event during the financial year under review

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and based on the above examination, We 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
NOT APPLICABLE			

(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 our 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
Not Applicable				

Nilesh A. Pradhan & Co., LLP
Company Secretaries

(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	Action taken by the listed entity if any	Comments of the Practicing Company Secretary on the action taken by the listed entity.
				NOT APPLICABLE

We report that:

1. The listed entity migrated from SME platform to the main Board of BSE Limited and listed on main board of National Stock Exchange of India Limited with effect from 25th November,2021.
2. Regulations 17 to 27, clauses (b) to (i) of Regulation 46(2) and paragraphs C, D and E of Schedule V of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 are applicable to the listed entity with effect from 25th November,2021.

For Nilesh A. Pradhan & Co., LLP
Company Secretaries



P.V. Padhye

Prajakta V. Padhye
Partner

FCS No: 7478.

COP No: 7891

PR: 791/2020

UDIN:F007478D000300001

Place: Mumbai

Date: 11th May,2022