

To,
BSE Ltd.
(Scrip Code-500365)
Listing Department,
P. J. Towers, Dalal Street,
Mumbai - 400 001

June 23, 2021

Dear Sirs/ Madam,

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

Dear Sirs/ Madam,

Please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, as certified by M/s. Mihen Halani & Associates, Practicing Company Secretaries. This Report has been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Kindly take the same on records.

Yours Faithfully,

For Welspun Specialty Solutions Limited
(Erstwhile RMG Alloy Steel Limited)



Rashmi Mamtura
Company Secretary
F-8658



MIHEN HALANI & ASSOCIATES

Practicing Company Secretaries

A-501/L, Jaswanti Allied Business Centre, Kachpada, Ramchandralane Extn. Rd,
Malad (West), Mumbai – 400 064, ☎: 022 – 6236 0279 ✉: mihenhalani@gmail.com

**Annual Secretarial Compliance Report of Welspun Specialty Solutions Limited
(Formerly RMG Alloy Steel Limited) for the year ended March 31, 2021**

To,
The Board of Directors,
Welspun Specialty Solutions Limited
(Formerly RMG Alloy Steel Limited)
CIN: L27100GJ1980PLC020358

BSE Scrip Code: 500365 / ISIN: INE731F01037

We, M/s. MihenHalani& Associates have examined:

- a) all the documents and records made available to us and explanation provided by **Welspun Specialty Solutions Limited (Formerly RMG Alloy Steel 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 March 31, 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

- d) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008-**Not Applicable during the period under review**;
- g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 - **Not Applicable during the period under review**;
- i) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 -**Not Applicable during the period under review**;
- j) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013-**Not Applicable during the period under review**;
- k) Other Rules and Regulations and the circulars/ guidelines issued thereunder;
 - The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

Based on the above examination, we hereby report that, during the Review Period:

- i. The listed entity has complied with all 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
1.	Regulation 29 of the SEBI (LODR) Regulations, 2015	The listed entity had intimated to the Stock Exchange on 28.07.2020 regarding Board Meeting held on 01.08.2020 (i.e. prior intimation of less than 5 days) for consideration and approval of the unaudited financial results for the quarter ended June 30, 2020.	The Board Meeting intimation was not submitted to the stock exchange 5 days prior to the meeting. Accordingly, the BSE Ltd has levied the penalty of Rs. 10,000/-. The penalty was duly paid by the listed entity.

- ii. 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.
- iii. No material 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 *except*:

Sr. No.	Action taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarments, etc.	Observation/ remarks of the Practicing Company Secretary, if any.
1.	BSE Ltd	Regulation 29 of the SEBI (LODR) Regulations, 2015 - The listed entity had intimated to the Stock Exchange on 28.07.2020 regarding Board Meeting held on 01.08.2020 (i.e. prior intimation of less than 5 days) for consideration and approval of the unaudited financial results for the quarter ended June 30, 2020.	The BSE Ltd, levied the penalty of Rs. 10,000/- for giving shorter notice of Board Meeting held on August 1, 2020.	The Board Meeting intimation was not submitted to the stock exchange 5 days prior the meeting. Accordingly, the BSE Ltd has levied the penalty of Rs. 10,000/-. The penalty was duly paid by the listed entity.

- iv. The listed entity has taken the following actions to comply with 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions
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				taken by the listed entity
1.	Not Applicable as the listed entity has already taken action(s) as mentioned in the previous report under the observation / remark of Practicing Company Secretary.			

Date: 14.06.2021
Place: Mumbai
UDIN: F009926C000460717

For MIHEN HALANI & ASSOCIATES
Practicing Company Secretary

MIHEN HALANI
Mihen Halani
(Proprietor)
CP No: 12015
FCS No: 9926