

May 30, 2022

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

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

Scrip Code: 531147

Scrip Symbol: ALICON

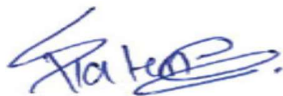
Sub: Annual Secretarial Compliance Report for the year ended on March 31, 2022.

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, 2022 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 horizontal line underneath.

Swapnal Patane
Company Secretary
M No.: ACS27424

SECRETARIAL COMPLIANCE REPORT
OF
ALICON CASTALLOY LIMITED
FOR THE YEAR ENDED 31.03.2022

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 31st March, 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;
- (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
Chandra
shankar
Shukla

Digitally signed by Upendra
Chandra Shankar Shukla
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serialNumber=8c762626c330c2013f
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66800f0113206a,
serialNumber=400057,
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serialNumber=70860f0a048896
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08134adacde176, cn=Upendra
Chandra Shankar Shukla,
Date: 2022.05.30 13:39:53 +05'30'

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- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **[Not Applicable since there was no reportable event during theyear under review];**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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:

Sr. No:	Compliance Requirement (Regulations/Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1)	Circular bearing No: SEBI/HO/CFD/DIL2/CIR/P /2019/94 dated 19/08/2019 – delay in filing application with NSE for trading approval.	Application for trading approval was to be filed by the Co. within 7 days from the date of receipt of listing approval i.e. it should have been filed on or before 23/09/2021 whereas it was filed on 30/09/2021.	The Company made representation stating that the delay was beyond the control due to technical issue and work from home policy during Covid-19 pandemic. The said compliance was on time with BSE.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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.
	National Stock Exchange of India Ltd. (NSE)	SEBI circular No. SEBI/HO/CF D/DIL2/CIR/P/2019/94 dated 19/08/2019 – alleged delay in filing application with NSE for trading approval.	NSE vide its letter No: NSE/LIST/28535- Fine dated 01/10/2021 levied the penalty of Rs.1,65,200/- for 7 days' delay	Delay was beyond the control of the Company due to technical issue and work from home policy during Covid-19 pandemic of all intermediaries. The said compliance was on time with BSE. NSE waived the penalty on representation by the Company.

(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 31/03/2020 (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
	There was a delay of 31 days in submitting the disclosure of Related Party Transactions for the six months' period ended on 30/09/2020 u/r 23(9) of SEBI (LODR) Reg. 2015	--	The Company represented for waiver of penalty levied by BSE and NSE and got the penalty waived.	NSE & BSE waived the penalty vide its respective letters dated 20/05/2021 and 25/06/2021.

UDIN: F002727D000424995
Place: MUMBAI
Date: 30/05/2022

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

Digitally signed by Upendra Chandrasha nkar Shukla
DN: c=IN, ou=Personal, title=2366,
givenName=Upendra, email=upendra@upendra.com,
serialNumber=1540294150469802f132206a,
postalCode=400057, cn=Upendra Shukla
serialNumber=C75d60fac4889f64aac3348
23465550ed6e1f8c4335208194adac0e176,
cn=Upendra Chandrasha nkar Shukla
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