



KANISHK STEEL INDUSTRIES LTD

Old No. 4, New No. 7, Thiru-Vi-Ka 3rd Street, Royapettah High Road,
Mylapore, Chennai - 4. Ph : (044) 4291 9700 Fax : (044) 4291 9719
CIN : L27109TN1995PLC067863
E-mail : sales@kanishksteels.in

Date: 29th April 2022

ISO 9001



Bombay Stock Exchange
25th Floor, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Dear Sir(s),

Ref: Scrip Code: 513456 Scrip ID: KANSHST

Sub: Submission of Secretarial Compliance Report for the year ended 31.03.2022

We enclosed herewith the Secretarial Compliance Report for the year ended 31.03.2022 issued by a practicing company secretary in accordance with Regulation 24A of the SEBI(LODR) Regulations, 2015.

Please take on records.

Thanking You,

For KANISHK STEEL INDUSTRIES LIMITED,

VISHAL KEYAL

Chairman and Managing Director.



Encl: As above.



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Mylapore,
Chennai-600004

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**SECRETARIAL COMPLIANCE REPORT OF KANISHK STEEL INDUSTRIES LIMITED
FOR THE YEAR ENDED 31ST MARCH 2022.**

I, M K MADHAVAN, proprietor of M/s. M K MADHAVAN & ASSOCIATES, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by KANISHK STEEL INDUSTRIES 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- **Not applicable as the Company has not issued any debt securities during the financial 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 as the Company has not bought back/ proposed to buyback any of its securities during the financial year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- **Not applicable as the Company has not granted any share-based employee benefits during the financial year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- **Not applicable as the Company has not issued any debt securities 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 the Company has not issued any Non-Convertible and Redeemable Preference Shares 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, 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
1.	As per the SEBI circular no. SEBI/Cir/ISD/05/2011 & Regulation 31(2) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, entire 100% holding of the Promoter and Promoter group has to be in dematerialised form.	Only 90.02 of the Promoter and Promoter group is in dematerialised form.	Remaining promoter shares shall also be dematerialised.



(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/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.
	NIL			

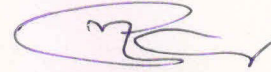
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2022.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Only 90.02 of the Promoter and Promoter group is in dematerialised form. As per the SEBI circular no. SEBI/Cir/ISD/05/2011	Only 90.02 of the Promoter and Promoter group is in dematerialised form. As per the SEBI circular no. SEBI/Cir/ISD/05/2011 & Regulation 31(2) of the SEBI (Listing Obligations and	The Company has taken all efforts to achieve 100% dematerialisation of shares i.e., held by the promoters/ promoter group.	The Company has taken efforts to dematerialise the remaining promoter shares.



<p>& Regulation 31(2) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, entire 100% holding of the Promoter and Promoter group has to be in dematerialised form.</p>	<p>Disclosures Requirements) Regulations, 2015, entire 100% holding of the Promoter and Promoter group has to be in dematerialised form.</p>	<p>And, the dematerialisation is under progress. The Company expects to achieve the above said 100% dematerialisation shortly.</p>	
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Signature:



M K MADHAVAN

Name of the Practicing
Company Secretary:

Membership No.: F-8408

C.P No.: 16796

P.R. No.: PR: 1221/2021

UDIN: F008408D000233259

Date: 28.04.2022

