

**Secretarial Compliance Report of Tamil Nadu Steel Tubes Limited for the  
Financial Year ended 31<sup>st</sup> March 2019**

1. I have examined the
  - a) All the documents and records made available to us and explanation provided by Tamil Nadu Steel Tubes Limited {"the Listed Entity"} arising from the compliances of specific Regulations listed in Para 2 infra.
  - b) The filings/submission made by the Listed Entity to the Stock Exchanges in connection with the above.
  - c) Website of the Listed Entity

for the year ended 31<sup>st</sup> March 2019 ("Review Period") in respect of Compliances 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 (Regulations) Act, 1956 (SCRA) Rules made thereunder and the Regulations, Circulars, Guidelines issued thereunder by the Securities and Exchange Board of India (SEBI)
2. 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 (Buyback of Securities) Regulations, 2018
    - e) The 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



**V.S.SOWRIRAJAN, BA, FCA, FCS, ACMA**  
**Company Secretary**

- g) The Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (No actions/events requiring compliance pursuant to this Regulations)

and based on the above examination, I hereby report that during the period under review:

- a) The Listed Entity has complied with the provisions of the above Regulations and the circulars/guidelines issued thereunder. However, in the absence of any fresh issue of capital, acquisitions and takeovers, buy back of securities, share based employee benefits, delisting, insider trading and issue and listing of debt securities, non-convertible debentures and redeemable preference shares during the period, the compliance of relevant regulations does not arise.
- 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 our examination of these records.
- c) No action was taken against the Listed Entity/ its promoters/directors/material subsidiaries either by the SEBI or by the Stock Exchanges (including under the Standard Operating Procedures issued by the SEBI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued there under.
- d) This being the first report submitted under the Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, submission of Action Taken Report in respect of observations made in the previous reports does not arise.

Place : Chennai  
Date : 27/05/2019



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