



Impex Ferro Tech Limited

CIN No. : L27101WB1995PLC071996

Corporate & Communication Office :
SKP HOUSE
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Telephone : +91 33 4016 8000/8100,
Fax : +91 33 4016 8107
E-mail : info@impexferrotech.com
Web : www.impexferrotech.com

Works :
Kadavila Dendua Road, P.O. Kalyaneshwari,
P.S. Kulti, Dist.: Burdwan, Pin - 713 369
West Bengal
Ph : (0341) 2522 248 (3 lines)
Fax : (0341) 2522 961

27th May, 2022

To The Listing Department BSE Limited P.J. Towers, 25 th Floor Dalal Street Mumbai – 400 001 <u>Ref: Scrip Code - 532614</u>	To The Listing Department National Stock Exchange of India Limited Exchange Plaza Bandra Kurla Complex Mumbai – 400 051 <u>Ref: Scrip Symbol - IMPEXFERRO</u>
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Dear Sir,

Sub: Compliance under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/38 dated 19th March, 2020 and SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/109 dated 25th June, 2020, please find enclosed herewith the Annual Secretarial Compliance Report issued by Mr. K. C. Dhanuka, Practising Company Secretary, for the Financial Year ended on 31st March, 2022.

Request you to take the same on record.

Thanking You,

Yours Sincerely
For **Impex Ferro Tech Limited**

RICHA
Chartered Accountant
21, 2nd Floor, 27th Street, Park Road, Kolkata - 700 012
Registration No. 12464/S/2010
ICAI Membership No. 12464/S/2010

LATH
Chartered Accountant
21, 2nd Floor, 27th Street, Park Road, Kolkata - 700 012
Registration No. 12464/S/2010
ICAI Membership No. 12464/S/2010

Richa Lath
Company Secretary & Compliance Officer

Encl: As Above

**Secretarial Compliance Report of Impex Ferro Tech Ltd.
for the year ended March 31, 2022**

We have examined:

- (a) all the documents and records made available to me and explanation provided by Impex Ferro Tech Ltd. ("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, 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 ("SEBI(LODR) Regulations, 2015");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the listed entity during the Review Period)
- (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 to the listed entity during the Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the Review Period)



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the listed entity during the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015;

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.	Regulation 30 read with Schedule III of SEBI (LODR) Regulations, 2015 for the submission of Financial Results for the quarter ended 30 th June, 2021.	Delayed in submission of Financial Results for the quarter ended 30 th June, 2021 to NSE by 3 minutes as required by Regulation 30 read with Schedule III of LODR-2015	As mentioned in Deviation.
2.	Regulation 34 of SEBI (LODR) Regulations, 2015 for submission of Annual Reports for the year ended 31 st March, 2021	Delayed in submission of Annual Reports for the year ended 31 st March, 2021 as required by Regulation 34 of SEBI (LODR) Regulations, 2015	As mentioned in Deviation

- (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.

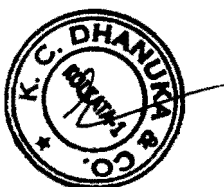


(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ 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.
1	NSE – E-mail dated 17 th January,2022	Regulation 34 of SEBI (LODR) Regulations, 2015. Delayed in submission of Annual Reports for the year ended 31 st March, 2021.	Fine Imposed by NSE of Rs.23,600/-	Fine of Rs.23,600/- imposed by the NSE was paid by the Company on 3 rd February, 2022 through NEFT.
2	BSE – E-mail dated 17 th January,2022	Regulation 34 of SEBI (LODR) Regulations, 2015. Delayed in submission of Annual Reports for the year ended 31 st March, 2021.	Fine Imposed by BSE of Rs.23,600/-	Fine of Rs.23,600/- imposed by the BSE was paid by the Company on 3 rd February, 2022 through NEFT.

(d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (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
-----NOT APPLICABLE-----				



K.C. DHANUKA & CO

COMPANY SECRETARIES

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21 HEMANTA BASU SARANI,
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Mobile : 98300 53619,
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- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities" is not applicable during the Review Period.

Place : Kolkata
Date : 26th May, 2022



K.C. DHANUKA & CO
Company Secretaries

K. C. Dhanuka
26/05/2022
K. C. DHANUKA
Proprietor
FCS-2204, CP-1247
Peer Reviewer No.108
UDIN: F002204D000394035