



LLOYDS STEELS INDUSTRIES LIMITED

Corporate Office :A-2, Madhu Estate, 2nd Floor, Pandurang Budhkar Marg, Lower Parel (W), Mumbai 400 013.
Tel: 91-22-6291 8111 email : infoengg@lloyds.in website: www.lloydsengg.in CIN : L28900MH1994PLC081235

MP/LSIL/ BSEL-NSEL/2021/36

18.06.2021

The Department of Corporate Services, BSE Limited 27th Floor, P.J. Towers, Dalal Street, Mumbai - 400 001	The National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051
Scrip Code : 539992	Symbol: LSIL

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31.03.2021

With reference to the above subject and in terms of the SEBI circular No. CIR/CFD/CMD1/ 27/2019 dated 8th February, 2019; we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For Lloyds Steels Industries Limited

MEENAKSHI

ANKIT PANSARI

Digitally signed by
MEENAKSHI ANKIT PANSARI
Date: 2021.06.18 10:19:42
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Meenakshi A. Pansari
Company Secretary



SECRETARIAL COMPLIANCE REPORT

of

Lloyds Steels Industries Limited
for the financial year ended 31st March 2021

To,

The Board of Directors,

Lloyds Steels Industries Limited (CIN : L28900MH1994PLC081235)

I, Hemaantt Maheshwari, Company Secretary in Practice have examined:

- all the documents and records made available to us and explanation provided by **Lloyds Steels Industries Limited** ("the listed entity") and its officers;
- the filings/submissions made by the listed entity to the stock exchanges viz., BSE Ltd. (Scrip Code : 539992) and National Stock Exchange of India Ltd. (Symbol : LSIL);
- website of the listed entity viz. <http://www.lloydsengg.in/>; and
- other documents and reports filed with the aforesaid Stock Exchanges from time to time.

for the year ended 31st March 2021 ("review Period") in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 hereinafter referred as "SEBI (LODR) Regulations 2015";
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (Not Applicable during the review period);
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not Applicable during the review period);
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable during the review period);





- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not Applicable 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 during the review period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants Regulations) 2018;
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;
- (k) The Depositories Act, 1996 and the Regulations and Byelaws framed thereunder;

and based on my examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations, circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks
1.	As per Regulation 17(1)(c) of SEBI (LODR) Regulations 2015 and explanation thereof, The Board of Directors of listed entity shall comprise of not less than 6 (Six) Directors w.e.f. 1 st April 2020.	The listed entity did not appoint the 6 th Director till 10 th September 2020 causing delay in appointment by 91 days for the quarter ended June 2020 and 72 days for the quarter ended September 2020, respectively.	It was observed that delay was caused due to exceptional circumstances which was rectified by appointing 6th Director on 11th September 2020 on the Board of Directors of the listed entity.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations, 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 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
1.	BSE Limited vide its emails received on 20 th August 2020 and 17 th November 2020.	Delay in appointment of 6th Director as required by regulation 17(1)(c) of SEBI (LODR) Regulations 2015 and its explanation thereof.	Fine of Rs. 4,55,000/- for the entire quarter of June 2020 and Rs. 3,60,000/- for 72 days of continued non-compliance till 10 th September 2020 for the quarter ended September 2020.	After considering the company's representation requesting waiver of fine and facts of the case the BSE Limited completely waived off the fine by their mail dated 16th February 2021.
2.	National Stock Exchange of India Limited (NSE) vide their letters NSE/LIST-SOP/CG/FIN ES/101661 dated 20th August 2020 and NSE/LIST-SOP/COMB/FINES/0810 dated 17 th November 2020.	Delay in appointment of 6th Director as required by regulation 17(1)(c) of SEBI (LODR) Regulations 2015 and its explanation thereof.	Fine of Rs. 4,55,000/- for the entire quarter of June 2020 and Rs. 3,60,000/- for 72 days of continued non-compliance till 10 th September 2020 for the quarter ended September 2020.	NSE by its letter dated 14th April 2021 waived off partial amount and levied the fine amounting to Rs. 4,15,000/- based on representations made by entity which was duly deposited by the listed entity on 20th April 2021. Both event happened after review period.

(d) There were no observation made in the previous report given for the financial year





2019-20.

Note : In the wake of COVID-19 pandemic outbreak, documents maintained by the Company were provided through electronic means for my audit and I could not verify the original documents physically. However, the management of the Company has confirmed that all documents provided by electronic means are true and correct copies of original documents.

For H. MAHESHWARI & ASSOCIATES
COMPANY SECRETARIES



Hemaantt

HEMAANTT MAHESHWARI
PROPRIETOR
ACS No. : 26145
C P No. : 10245

DATE: 29th MAY 2021
PLACE : MUMBAI
UDIN : A026145C000392885