



VALLABH STEELS LIMITED

Regd. Off.: G.T. Road, Village Pawa, Sahnewal, Ludhiana-141 120(Punjab), India,
CIN: L27109PB1980PLC004327 Tel.:+91-161-2511413, Fax: +91-161-2511414,
E-mail: fin.ho@vallabhgroup.com, website: www.vallabhsteelsltd.in

VSL: BSE: 2021-22

Dated: 29.06.2021

BSE Limited
(Corporate Relationship Department)
Floor-25, P.J. Towers,
Dalal Street,
Mumbai- 400 001

Sub: Secretarial Compliance Report of the Company, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the financial year ended 31.03.2021.


Dear Sir,

Please find enclosed herewith a copy of Secretarial Compliance Report of the Company issued by Company Secretary in practice, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended read with SEBI circular no. CIR/CFD/CMD/1/27/2019 dated February 08, 2019, for the financial year ended 31.03.2021.

This is for your kind information and record.

Thanking yqu,

Yours faithfully,
For Vallabh Steels Limited


(Komal Bhalla)
Company Secretary

Encl.: as above

RCS & COMPANY
Company Secretaries
11-Decent Enclave, Barewal Road, Ludhiana - 141 012
(M): +91-7087028182; Email: rcsingal54@yahoo.com

SECRETARIAL COMPLIANCE REPORT OF
VALLABH STEELS LIMITED FOR THE YEAR ENDED 31st MARCH 2021
(Pursuant to SEBI Circular No. CIR/CFD/CMD/1/27/2019 dated February 08, 2019)

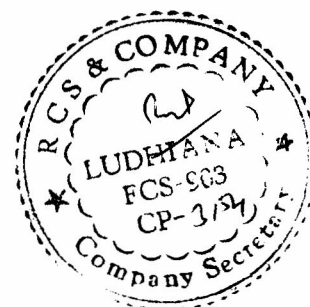
To
The Members,
Vallabh Steels Limited
Village Pawa,
G T Road, Sahnewal,
Ludhiana

I, Raghubir Chand Singal, Prop. RCS & Co., Practicing Company Secretary (FCS No. 903 and CP No. 3154) have examined:

- (a) all the documents and records made available to us and explanations provided by Vallabh Steels Limited,
- (b) the filings/ submissions made by the Vallabh Steels Limited, to the stock exchanges,
- (c) website of the Vallabh Steels Limited,
- (d) any other document/ filing, as have been found to be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2021 ("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 read with circulars, guidelines issued thereunder;
- (b) Securities and exchange Board of India (Issue of Capital and Disclosure Requirements) Regulation, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



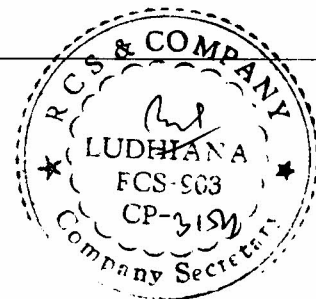
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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
Not applicable during the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits Regulations, 2014);
Not applicable during the period under review.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
Not applicable during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non - Convertible and Redeemable Preference Shares) Regulations, 2013;
Not applicable during the period under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 the matters specified below:-

Sr. No.	Compliance Requirement (Regulations /Circulars/ Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Annual Report for the year ended 31.03.2020 under Regulation 34 of the SEBI (LODR) Regulations, 2015	Delay in submission of Annual Report	As explained by the Company, the concerned staff did not attend the office due to COVID-19 effect due to which same could not be submitted in time.
2	Constitution of the Board of Directors. Regulation 17 of the SEBI (LODR) Regulations, 2015	Board of Director is constituted including women	As explained by the Company the matter of registration is under process.



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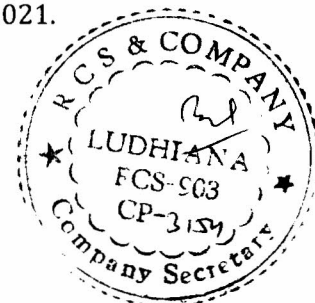
		Director but the registration of Independent Directors with Independent Directors Data Bank is pending.
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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my 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	BSE Limited	Late submission of Annual Report for the year ended 31.03.2020	A penalty of Rs. 7,080/- inclusive of GST was imposed on the Company.	Amount of penalty was paid by the Company on 12.01.2021.

Notes: BSE Limited issued a letter dated 18.01.2021 for non-compliance of Regulation 23(9) of the SEBI (LODR) Regulations, 2015 for which the Company has already made a representation to BSE Limited clarifying its position vide its letter dated 01.02.2021.



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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 31.03.2020	Observation made in the secretarial compliance report for the year ended- 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
None				

There was no case of any action taken by SEBI/ Stock Exchange(s) against the Company in the previous report. As such no action to comply was required by the Company.

Place: Ludhiana
Date: 25.06.2021

For RCS & COMPANY
Company Secretaries

(RAGHUBIR CHAND SINGAL)
Prop.
FCS No. 903

CP No.: 3154
UDIN: F000903C000514361

