



Impex Ferro Tech Limited

CIN No. : L27101WB1995PLC071996
27th July, 2020

Corporate & Communication Office :

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Works :

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P.S. Kulti, Dist.: Burdwan, Pin - 713 369
West Bengal
Ph : (0341) 2522 248 (3 lines)
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To
The Listing Department
BSE Limited
P.J. Towers, 25th Floor
Dalal Street
Mumbai - 400 001

Ref: Scrip Code - 532614

To
The Listing Department
National Stock Exchange of India Limited
Exchange Plaza
Bandra Kurla Complex
Mumbai - 400 051

Ref: Scrip Symbol - IMPEXFERRO

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. H. M Choraria, Practising Company Secretary, for the Financial Year ended on 31st March, 2020.

Request you to take the same on record.

Thanking You,

Yours Sincerely
For **Impex Ferro Tech Limited**

Richa Agarwal

Richa Agarwal
Company Secretary & Compliance Officer

Encl: As Above

SECRETARIAL COMPLIANCE REPORT
OF
IMPEX FERRO TECH LIMITED FOR THE YEAR ENDED ON 31ST MARCH 2020

I, Hanuman Mal Choraria, (Proprietor) of M/s H. M. Choraria & Co., Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by the Company (“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 on 31st March 2020 (“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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
(i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993

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
	Nil	N.A.	NA

- (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 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.
	None	NA	N.A.	NA

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

Sr. No.	Observations of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

(e) It was reported that the listed entity had suitably modified the terms of appointment of statutory auditors in terms of Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019.

For M/s H.M. Choraria & Co.
Practising Company Secretary

HANUMA
N MAL
CHORARIA

Digitally signed by HANUMAN MAL CHORARIA
DN: cn=HL, o=Personal, cn=HANUMAN MAL CHORARIA,
serialNumber=3801671b301d9e8cd555
92491a8b11ed1186a2ce89515af1274
857b584b30, postalCode=700048,
2.5.4.20=aa5414476516c5b9e5d2f8
cb255b7008d8e5559646994bc70b
b2f2b, st=West Bengal
Date: 2020.07.26 14:53:19 +0530

(Hanuman Mal Choraria)
(Proprietor)

FCS No.: 2398, C P No.: 1499
UDIN NO. F002398B000506022

Place: Kolkata
Date: 26.07.2020