



# Modern Steels Limited

CORPORATE OFFICE : 98-99, SUB CITY CENTRE, SECTOR 34, CHANDIGARH - 160 022 (INDIA)

Tel : +91-172-2609001, 2609002, FAX : +91-172-2609000

E-mail : info@modernsteels.com, CIN : L27109PB1973PLC003358

**Ref: MSL/SECT/BSE/**

**Date: 25<sup>th</sup> May, 2022**

M/s. BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai-400001

**Sub: Submission of Secretarial Compliance Report  
for the Financial Year ended 31<sup>st</sup> March, 2022**

Dear Sir,

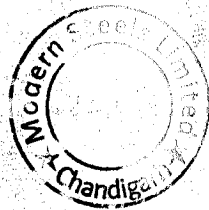
Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019; we are enclosing herewith the “**Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022**” as issued by M/s Brij Agnihotri & Associates, Practicing Company Secretaries, in the format as prescribed under the said circular.

This for your information and record please.

Thanking you

Yours faithfully,  
For **Modern Steels Limited**

**Company Secretary**



Enclosed: as above

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF MODERN STEELS LIMITED FOR  
THE FINANCIAL YEAR ENDED MARCH 31, 2022**

*[Pursuant to Regulation 24A of Securities and Exchange Board of India  
(SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

We, **Brij Agnihotri & Associates, Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **Modern Steels Limited** ("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 **31<sup>st</sup> March 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:-

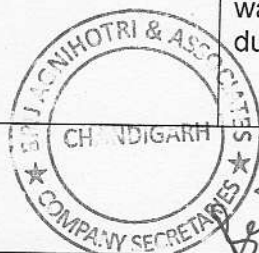
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**LODR Regulations**");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable (N.A.) to the Company during the year under review
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; [**To the extent applicable**]
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable (N.A.) to the Company during the year under review
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable (N.A.) to the Company during the year under review
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable (N.A.) to the Company during the year under review

- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable (N.A.) to the Company during the year under review
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; Not Applicable (N.A.) to the Company during the year under review
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; **[To the extent applicable]**
- (j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; Not Applicable (N.A.) to the Company during the year under review
- (k) Any other regulations as applicable : Not Applicable

Based on the above examination, We 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:-

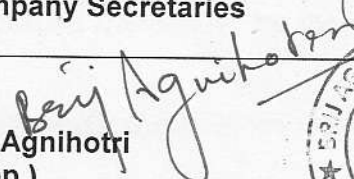
Sr. No.	Compliance Requirements (Regulations/ circulars / guidelines including specific clause)	Deviations	Remarks of the Guidelines Practicing Company Secretary
1.	Maintenance of website containing the basic information about the listed entity and other disclosures as per Regulation 46 of SEBI ( Listing Obligation and Disclosure Requirement) Regulations 2015)	The website of the listed entity is temporarily under maintenance due to technical issues, as informed by the Company representatives.	The website of the listed entity is temporarily under maintenance due to technical issues, as informed by the Company representatives.
2.	Submission of unaudited / audited financial results to the Stock Exchange within 45 days of the close of each quarter / 60 days of the end of financial year as per Regulation 33 of SEBI (Listing Obligation and Disclosure Requirement) Regulations 2015)	There has been filing of financial results during the year with the Stock Exchange but the prescribed timelines have not been followed.	There has been filing of financial results with the Stock Exchange but the prescribed timelines have not been followed. However, the Company has already applied for waiver and fine has been duly paid to BSE.



*Brij Agnihotri*

- (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 those records.
- (c) There have been no 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.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not applicable**

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 by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	-	-	-
-	-	-	-	-

<b>Date:</b> 24.05.2022	<b>For Brij Agnihotri &amp; Associates</b> <b>Company Secretaries</b>
<b>Place:</b> Chandigarh <b>UDIN:</b> F007356D000372655	 <b>Brij Agnihotri</b> <b>(Prop.)</b> <b>FCS No. : 7356</b> <b>C.P. No. : 7831</b>

