

**Secretarial Compliance Report of Tamil Nadu Steel Tubes Limited for the  
Financial Year ended 31<sup>st</sup> March 2021  
[CIN:L27110TN1979PLC007887]**

1. I have examined the

- a) All the documents and records made available to us and explanation provided by Tamil Nadu Steel Tubes Limited {"the Listed Entity"} arising from the compliances of specific Regulations listed in Para 2 infra.
- b) The filings/submission made by the Listed Entity to the Stock Exchanges in connection with the above.
- c) Website of the Listed Entity

for the year ended 31<sup>st</sup> March 2021 ("Review Period") in respect of Compliances 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 (Regulations) Act, 1956 (SCRA) Rules made thereunder and the Regulations, Circulars, Guidelines issued thereunder by the Securities and Exchange Board of India (SEBI)

2. 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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014

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**V.S.SOWRIRAJAN, BA, FCA, FCS, ACMA**  
**Company Secretary**

- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008
- g) The Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (No actions/events requiring compliance pursuant to this Regulations)

and based on the above examination, I hereby report that during the period under review:

- a) The Listed Entity has complied with the provisions of the above Regulations and the circulars/guidelines issued thereunder. However, in the absence of any fresh issue of capital, acquisitions and takeovers, buy back of securities, share based employee benefits, delisting, insider trading and issue and listing of debt securities, non-convertible debentures and redeemable preference shares during the period, the compliance of relevant regulations did not arise.
  - 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 these 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:



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**Company Secretary**

<b>Sr. No.</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc.</b>	<b>Observations! remarks of the Practicing Company Secretary, if any.</b>
1	SEBI	Regulation 6 (1) – Non compliance of provisions relating to the appointment of Qualified Company Secretary as Compliance Officer	Fine of Rs.35,400 imposed on the entity and the same was duly paid.	Non-Compliance was for a temporary period and the same was rectified with the appointment of Qualified Company Secretary as Compliance Officer.

(d) There was no action required to be complied with the entity , since no observation was made in the Secretarial Compliance Report relating to previous years.

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year endeth (The years are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
		NIL		

DATE : 29/06/2021

PLACE : TRICHY

Signature:

Date: Name of the Practicing Company Secretary ; V.S.SOWRIRAJAN

FCS : 2368

C P No.: 6482

UDIN: F002368C000537056



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