

Partners

P D Sharma

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SHARMA SARIN & ASSOCIATES
COMPANY SECRETARIES

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To

NOVA IRON AND STEEL LIMITED
VILLAGE-DAGORI TEHSIL -BELHA,
BILASPUR CT 495224 IN

REF: SECRETARIAL COMPLIANCE REPORT of NOVA IRON AND STEEL LIMITED CIN: L02710CT1989PLC010052 having Registered Office at # VILLAGE-DAGORI TEHSIL -BELHA, BILASPUR CT 495224 IN for the year ended 31ST March, 2019.

I, P.D.SHARMA Partner of Sharma Sarin & Associates, a firm of Company Secretaries having our office at SCO: 186-188, 1st Floor, Sector 17C, Adjoining Ghazal Restaurant, Chandigarh – 160017, has examined:

(a) All the documents and records made available to me and explanation provided by **NOVA IRON AND STEEL LIMITED** (hereinafter referred to as "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 **March 31st, 2019** ("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 there under; and



(b) The Secretaries Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;

(Not Applicable to the Company during the review period);

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:

(Not Applicable to the Company during the review period);

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:

(Not Applicable to the Company during the review period);

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:

(Not Applicable to the Company during the review period);

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:

(Not Applicable to the Company 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 to the Company during the review period);

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

(Not Applicable to the Company during the review period);



(i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Act and dealing with client.

And 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 there under, 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
1.			
NIL			

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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/ 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 there under:

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		-----NA-----		

(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	Observations made in the secretarial compliance report for the year ended on 31.03.2019.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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PLACE: CHANDIGARH

DATE: 03.08.2019

For SHARMA SARIN & ASSOCIATES

COMPANY SECRETARIES



FCS P.D. SHARMA

Partner

Membership No: 2285

COP: 2692