



ASHIANA ISPAT LIMITED

CIN : L27107RJ1992PLC006611
www.ashianaispat.in

Corporate Office :
908-910, Pearl Best Height-II
Netaji Subhash Place
Pitampura, New Delhi-110034
Ph. : 011-49032928, 49032938
Email : ail@ashianaispat.in
ashianagroup@yahoo.co.in

Date: 28.05.2022

The Manager

The Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai - 400 001

Scrip Code: 513401

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2022

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019, please find attached herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2022 issued by M/s. *Bir Shankar & Co.*, Company Secretaries (FCS - 6604 and CP No. - 7076).

This is for your kind information and records please.

Thanking You,

Yours faithfully,

For Ashiana Ispat Limited

(Harun Rashid Ansari)
Company Secretary

Encl: as above



Regd. Office & Works :
A-1116, RIICO Industrial Area, Phase-III
Bhiwadi-301019, Distt. Alwar (Rajasthan)
Phone : 01493-520100, Fax : 01493-520126



BIR SHANKAR & Co.

Secretarial Compliance Report of Ashiana Ispat Limited for the year ended 31st March 2022 under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 08, 2019.

The Board of Directors,
M/s. Ashiana Ispat Limited
A-1116, Phase-III, RIICO Industrial Area,
Bhiwadi, Alwar, Rajasthan-301019

We have examined:

1. All the documents and records made available to us and explanation provided by Ashiana Ispat Limited ("the listed entity"),
2. The filings / submissions made by the listed entity to the stock exchanges,
3. Website of the listed entity,
4. Any other document / filing, as may be relevant, which has been relied upon

For the year ended 31st 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 there under; and
- b. The Securities 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 for Review Period);
- 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. (Not applicable for the Review Period);
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014. (Not applicable for the Review Period);
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008. (Not applicable for the Review Period)
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable for the Review Period);
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. SEBI (Depositories and Participants) Regulations, 2018 and circulars/Guidelines issued there under;

and based on the above examination, we hereby report that, during the Review Period:

Amw



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	Remarks
1	Regulation 17 (1) of SEBI (LODR) Regulations, 2015	The Composition of the Board did not fulfil the requirement of independent directors (Section 149 of the Companies Act, 2013 and SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015)	Non-compliance with the provisions of Regulation 17 of SEBI (LODR) Regulations, 2015 w.e.f 27/02/2022	Independent Directors on the Board of the Company except Mrs. Shruti Jain are required to pass online proficiency self-assessment test conducted by the IICA. But Mr. Nitin Jain, Mr. Bharat Monga and Mr. Shashank Jain did not qualify the exam and sought some more months to clear the exam. In this circumstances Company decided to reconstitute the Board in terms of the applicable provisions of Section 149 of the Companies Act, 2013 and SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015.

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

[Handwritten signature]




Sl. 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
NIL	NIL	NIL	NIL	NIL

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

S. No.	Observations of the Practicing Company Secretary in the previous report	Observations made in the Secretarial compliance report for the year ended 2019-20 and 2020-21	Actions taken by listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non-compliance with disclosure notice of related party under Regulation 23(9) of SEBI LODR, 2015	In the secretarial compliance report for 2020-21, the following observation was made: Non-compliance with disclosure notice of related party under Regulation 23(9) of SEBI LODR, 2015	On receiving notice dt 18.01.2021 Company has submitted the requisite information to BSE	Company took the appropriate steps to comply with the necessary regulations in a timely manner

For Bir Shankar & Co.
Company Secretaries


(Bir Shankar)

Prop.
FCS

C.P.: 7076

UDIN: F006604D000415760

Dated: 28/05/2022

Place: Delhi,

