

11.06.2021

Department of Corporate Service  
**Bombay Stock Exchange Ltd.**  
Phiroze Jeejeebhoy Tower.  
Dalal Street,  
Mumbai – 400001

Manager  
Listing Department  
**National Stock Exchange of India Ltd.**  
Exchange Plaza, Plot No C/1, G-Block,  
Bandra – Kurla Complex, Bandra (E),  
Mumbai – 400051

**BSE Scrip Code: 513436**

**NSE Symbol – SHAHALLOYS**

Dear Sir(s),

**Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended on 31<sup>st</sup> March, 2021.**

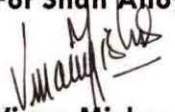
Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, and relaxation provided by SEBI *inter-alia* for submission of Annual Secretarial Compliance Report by listed entities, vide Circular No. SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021, due to the ongoing impact of the Second Wave of CoVID-19 pandemic and restrictions imposed by various State Governments, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended on 31st March, 2021, issued by M/s. Kamlesh M. Shah & Co., Practicing Company Secretaries.

You are requested to take the same on record and acknowledge the receipt of the same.

Thanking you.

Yours faithfully,

**For Shah Alloys Limited**

  
**Vinay Mishra**

Company Secretary & Compliance Officer



**Encl.:** As mentioned above



**SECRETARIAL COMPLIANCE REPORT OF SHAH ALLOYS LIMITED FOR THE YEAR ENDED**  
**MARCH 31, 2021**

I Kamlesh M. Shah have examined;

- all the documents and records made available to us and explanation provided by **SHAH ALLOYS LIMITED** (CIN: L27100GJ1990PLC014698) ("the listed entity");
- the filings / submissions made by the listed entity to the stock exchanges;
- website of the listed entity; and
- any other document / filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 2021** ("Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable for the year under report)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable for the year under report)**
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable for the year under report)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable for the year under report)**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable for the year under report)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not Applicable for the year under report).**



**KAMLESH M. SHAH & CO.**

B.COM . LL.B.. A.C.S.

Since - 1993

PEER REVIEWED

**PRACTICING COMPANY SECRETARY**

801-A, 8th Floor, Mahalay Complex, Opp. Choice Restaurant Lane, B/h. Fairdeal House,  
Off. C. G. Road, Navrangpura, Ahmedabad - 380 009. Mo.: 09825097709 Phone : 079-26447709  
E-mail : kshahcs@yahoo.co.in, cskshah@rediffmail.com

and circulars / guidelines issued thereunder and based on the above examination, I hereby report that, during the period under report:

- (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
1	NA	NA	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 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 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.
				Not Applicable

- (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 March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
				Not Applicable

For Kamlesh M. Shah & Co.,  
Practicing Company Secretary



Kamlesh M. Shah  
(Proprietor)

(ACS: 8356, COP: 2072)

UDIN: A008356C000421582

Place: Ahmedabad  
Date: June 04, 2021