

# NARAYANI STEELS LIMITED

ERGO TOWER, PLOT NO. - A1 -4, BLOCK - EP & GPUNIT NO. - 1406, 14TH FLOOR, SECTOR -  
V SALLAKE WB 700091 IN, PH- 033 48040592  
[NARAYANISTEELSVIZAG@GMAIL.COM](mailto:NARAYANISTEELSVIZAG@GMAIL.COM) [WWW.NARAYANISTEELS.CO.IN](http://WWW.NARAYANISTEELS.CO.IN)  
GSTIN:37AAACN8563G1Z8 CIN: L24319WB1996PLC082021

Date: 18.05.2023

To,  
The Manager  
Department of Corporate Services  
**Bombay Stock Exchange Limited**  
1st Floor, New Trading Wing,  
Rotunda Building, Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400 001

Scrip Code: 540080  
Security Id- NARAYANI

Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year 2022-2023**

Pursuant to the provisions of Regulations 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March, 2023 issued by M/s Gopinath Nayak & Associates, Company Secretaries.

Kindly take the note of the same on your record.

Thanking You.

Yours faithfully

For Narayani Steels Limited

**ANKITA DUTTA**  
Digitally signed by ANKITA DUTTA  
DN: cn=Personal,  
2.5.4.2.1=6811833942520031981111640945133134  
403410170751d52575c588b2b721,  
postalCode=702103, st=ARUNACHAL PRADESH,  
serialNumber=70609516705649503161620165de  
027c0c5e209ac3b749e0031f0c84d99d,  
cn=ANKITA DUTTA, o=SHANGHAI,  
pseudoym=d61501cda90415f442358b07601  
39a, email=C3.ANKITA@GMAIL.COM  
Date: 2023.05.18 17:45:35 +05'30'

**Ankita Dutta**  
**Company Secretary & Compliance Officer**

Encl.: as above



**Secretarial Compliance Report of**  
**M/s Narayani Steels Limited (L24319WB1996PLC082021) for the year ended**  
**31.03.2023**

I have examined:

- all the documents and records made available to us and explanation provided by M/s Narayani Steels Limited (L24319WB1996PLC082021),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2023 ("Review 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 there under; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- Securities Exchange Board of India (Registrar to an Issue and Share Transfer Agent) Regulations, 1993

and circulars/ guidelines issued there under; and based on the above examination, I hereby report that, during the Review Period:

- 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
01	Section 2(19),203 of Companies Act,2013	Section 2(19),203 of Companies Act,2013	Company taking steps to appoint CFO as soon as possible
02	Section 138(1),203 of Companies Act,2013	Section 138(1),203 of Companies Act,2013	Company taking steps to appoint INTERNAL AUDITOR as soon as possible

- (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 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.
NIL	NIL	NIL	NIL	NIL
NIL	NIL	NIL	NIL	NIL

- (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 2023 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity

Company i.e. Narayani Steels Limited was taken over by another company i.e. Rishikunj Vincom Private Limited by Order dated January 11, 2022 passed by the Hon'ble National Company Law Tribunal (NCLT), Kolkata Bench in IA(IB) No.955/KB/2021 in CP(IB) No. 986/KB/2020 and in terms of the approved Resolution Plan under section 31(1) of the Insolvency and Bankruptcy Code, 2016.

Place: Bhubaneswar

Date: 18.05.2023

Signature:   
Gopinath Nayak & Associates

Practicing Company Secretary  
ACS No.:25843  
C P No.: 9834

