

SECRETARIAL COMPLIANCE REPORT

OF

M/S. PANCHMAHAL STEEL LTD.

CIN: L27104GJ1972PLC002153

FOR THE YEAR ENDED 31ST MARCH, 2022

I Niraj Trivedi have examined;

(a) all the documents and records made available to us and explanation provided by
M/s. Panchmahal Steel Ltd. (“the Listed Entity”),

(b) the filings / submissions made by the Listed Entity to the Stock Exchange,

(c) website of the Listed Entity, and

(d) any other document/ filing, as may be relevant, which has been relied upon to make
this certification,

for the year ended 31st March, 2022 (“Review Period”) in respect of compliance with the
provisions of:-



Page 1 of 5

1. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Rules, Regulations, Circulars, Guidelines issued thereunder; and
2. 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:-

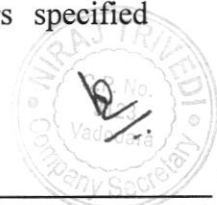
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – **Not Applicable for period under review;**
- (c) Securities and Exchange Board 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 review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 – **Not Applicable for review period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – **Not Applicable for review period;**



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not Applicable for review period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993;
- (j) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- (k) other Regulations as applicable and Circulars / Guidelines issued thereunder;

the listed entity has complied with various Circulars/Guidelines including clause 6(A) and 6(B) of SEBI circular no.: CIR/CFD/CMD1/114/2019 dated 18th October, 2019 issued under above Regulations and based on the above examination and considering the relaxations granted by the Securities and Exchange Board of India (SEBI) warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Review Period:

- (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	Observation / Remarks of the Practicing Company Secretary
Not Applicable			

(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 Exchange (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...	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
Not Applicable				

DATE : 23RD MAY, 2022

PLACE : VADODARA



Signature :



Name of PCS : NIRAJ TRIVEDI

FCS : 3844

C. P. No. : 3123

UDIN : F003844D000363742