



# SHREE PRECOATED STEELS LTD.

CIN : L70109MH2007PLC174206

Regd. Office : 1. Ground Floor, Citi Mall, New Link Road, Andheri (W), Mumbai 400 053

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Ref: SEC/SPSL/BSE /2020-21

Date: 3<sup>rd</sup> July, 2020

**The Bombay Stock Exchange Limited**

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai – 400 001

Script Code : 533110

**Ref: SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019**

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2020**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (LODR) Reg. 2015 read with SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 08, 2019; we are hereby submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2020, issued by Mr. Haresh Sanghvi, Practicing Company Secretary and the Secretarial Auditor of the Company.

We request you to take the above record.

Thanking You.

Yours faithfully,

**For SHREE PRECOATED STEELS LIMMITED**

**AKSHAY SHARMA**

**COMPLIANCE OFFICER**

**Encls: As above**

**Secretarial Compliance Report of  
Shree Precoated Steels Limited  
(CIN: L70109MH2007PLC174206)  
for the year ended 31<sup>st</sup> March, 2020**

*[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

**I, Haresh Sanghvi** have examined:

- (a) the documents and records made available to me and explanation provided by **Shree Precoated Steels Limited** (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to BSE Ltd.,
- (c) website of the listed entity,
- (d) other books, papers, minute books and other records maintained by the Company and produced before me for verification which has been relied upon to make this certification,

for the year ended **31<sup>st</sup> March, 2020** (“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 thereunder; and
- (b) 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 following Regulations prescribed under the SEBI Act, whose provisions and the circulars/ guidelines issued thereunder, have been examined:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI (LODR), 2015”);
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; and
- (e) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.



*Haresh Sanghvi*  
*Practicing Company Secretary*

There were no actions/ events in pursuance of following Regulations prescribed under SEBI Act, requiring compliance thereof by the Company during the period under review:

- (a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (b) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- (e) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009

and based on the above examination and verification of the documents and records produced before me and according to the information and explanations given to me by the Company, I hereby report that, during the Period under review:

- (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:

<b>Sr. No.</b>	<b>Compliance Requirement (Regulations/ circulars / guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1	Regulation 34 (3) read with Schedule V of SEBI (LODR), 2015	Details on "change in Return on Net-worth" in accordance with Schedule V of SEBI (LODR), 2015 is not incorporated in the Annual Report	The required details were inadvertently missed out in the Annual Report for FY 18-19. However, the same is not significant since the Net-worth is negative and the Company has not carried out any business activity for the FY 18-19.

- (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) No actions were 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.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:



*Haresh Sanghvi*  
*Practicing Company Secretary*

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in 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
1	Regulation 45 of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 as the Name of the Company is not in line with the business activities carried out by the Company	Year ended 31 <sup>st</sup> March, 2019	The management informed that the suitable further action in this regard will be taken once the road map to revive the Company operations is finalized.	Since past couple of years, the company has no operations and no revenue has been generated. In view thereof the change of name is not permissible.

**Place: Mumbai**

**Date: 27<sup>th</sup> June, 2020**



**Haresh Sanghvi**  
**Practicing Company Secretary**  
**FCS No.: 2259/CoP No.: 3675**  
**UDIN: F002259B000401911**

**Note:** Due to ongoing COVID19 pandemic and consequent lock-down imposed, I could not verify the compliance documents physically for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode.