



SHREE PRECOATED STEELS LTD.

CIN : L70109MH2007PLC174206

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

Tel.: + 91 - 7208182677 **Email** spsl investors@gmail.com **Website** www.spsl.com

Ref: SEC/SPSL/BSE/2021-22

Date: 30th June, 2021

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, 2021

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, 2021, issued by Mrs. Shreya Shah, 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 LTD.,

RAJ Y. SHAH
COMPAY SECRETARY & COMPLIANCE OFFICER
Encl: As above

Secretarial Compliance Report
of
SHREE PRECOATED STEELS LIMITED
(CIN: L70109MH2007PLC174206)
for the year ended 31st March, 2021

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I, **Shreya Shah** 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, and
- (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,

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 (“LODR Regulations, 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 (“PIT Regulations, 2015”); and
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

There were no actions/ events in pursuance of following Regulations prescribed under SEBI Act, requiring compliance thereof by the Company during the year ended 31st March, 2021 (“Period”) under review:

- (a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) 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 (Buyback of Securities) Regulations, 2018;
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- (f) 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:

SHREYA SHAH
Practising Company Secretary

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1	Regulation 18(2)(a) of SEBI (LODR) Regulations, 2015	The audit committee met three times in a year instead of four times	As informed by the management, the audit committee met three times in a year due to COVID 19 lockdown. The operations for Q4FY20 and Q1FY21 were reviewed in the single Audit Committee meeting held on 27 th July, 2020
2	Regulation 31A(8) of SEBI (LODR) Regulations, 2015	Intimation on submission of application by the promoter seeking re-classification from “promoter” group to “non-promoter” to the stock exchanges was made with delay of more than twenty-four hours.	The delay in filing intimation was caused due to inability of the compliance officer to reach the office from 17 th October 2020 to 22 nd October 2020 because of closure of office premises under BMC order due to detection of COVID-19 Positive case within the employees. The application seeking reclassification was approved by the Stock Exchange after considering the above clarification that the delay was not intentional but caused only due to exceptional circumstances.
3	Regulation 47 read with Regulation 30 with reference to disclosure of events specified under Clause 12 of Para A of Part A of Schedule III of SEBI (LODR) Regulations, 2015	Clippings of Newspaper publications referring to the intimation of Board Meeting held to approve Financial Results for the quarter ended 30 th September 2020 were not submitted to the stock exchange	The intimation of Board Meeting held on 6 th November, 2020 was published in the newspapers but the clipping of said newspapers was inadvertently not submitted to the stock exchange.

- (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 (SOP) issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.




SHREYA SHAH
Practising Company Secretary

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

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	Clause (1)(j) of Part “B” of Schedule V read with Regulation 34 (3) of SEBI (LODR), 2015 – Details on “change in Return on Net-worth” was not incorporated in the Annual Report for FY 18-19	Year ended 31 st March, 2020	No action taken by the company	According to explanation given by the company, it was not feasible to take corrective action

Place: Mumbai
Date: 30th June, 2021




Shreya Shah
Practicing Company Secretary
ACS No.: 39409/CoP No.: 15859
UDIN: A039409C000546377

Note: Due to restricted movement amid COVID-19 pandemic, no compliance documents were verified physically at the Company’s premises for the period under review and the reliance has been placed on the scanned documents obtained through electronic mode.