



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/2022-23

Date: 27th May, 2022

The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001
Script Code : 533110

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2022

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended from time to time and SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2022, issued by Ms. Shreya Shah, Practicing Company Secretary.

We request you to take the above record.

Thanking You.

Yours faithfully,

For SHREE PRECOATED STEELS LIMITED

DIVYA HISARIA
COMPANY SECRETARY
A62559

Encl.: As above

Secretarial Compliance Report
of
SHREE PRECOATED STEELS LIMITED
(CIN: L70109MH2007PLC174206)
for the year ended 31st March, 2022

[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, 2022 (“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 (LODR) Regulations, 2015	Gap of more than one hundred and twenty days elapsed between two Audit Committee meetings held on 8 th February, 2021 and 18 th June, 2021 respectively	As informed by the management, the Audit Committee could not meet anytime between 8 th February, 2021 and 18 th June, 2021 due to outbreak of 2 nd wave of COVID 19 and subsequent lockdown. The operations for Q4FY21 were reviewed in the Audit Committee meeting held on 18 th June, 2021
2	Regulation 31 of SEBI (LODR) Regulations, 2015	Delay in submission of shareholding pattern for the quarter ended on 31 st December, 2021	According to the explanation given by the Company, the alleged non-compliance was caused due to delayed receipt of Ben-pos from the depository (CDSL) since the Ben-pos was blocked by CDSL on account of outstanding dues. On being aware of the situation via the Company's RTA, the Company cleared the outstanding dues and requested CDSL to release the Ben-pos which was only released after the due date of the compliance had lapsed. In this regard, SOP review notice has been received from BSE Limited for the alleged non-compliance under the said regulation and the Company has made the payment of INR 21,240/- towards the fines levied. Further, the waiver request application along with the requisite representations has also been submitted to BSE Limited. However, no further correspondence was received from BSE in this regard
3	Regulation 34(1) of SEBI (LODR) Regulations, 2015	Annual report was submitted to the stock exchange on 7 th September, 2021, i.e. delay of one day from the date of commencement of dispatch to the shareholders i.e. 6 th September, 2021	According to the explanation given by the Company, the intimation was delayed inadvertently by one day.



SHREYA SHAH
Practising Company Secretary

- (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 except mentioned below:

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
1.	BSE Limited vide their email dated 14 th February, 2022	Delay in submission of shareholding pattern for the quarter ended on 31 st December, 2021 as required under Regulation 31 of LODR Regulations, 2015	Fine of INR 21240/-	<p>According to the explanation given by the Company, the alleged non-compliance was caused due to delayed receipt of Ben-pos from the depository (CDSL) since the Ben-pos was blocked by CDSL on account of outstanding dues. On being aware of the situation via the Company's RTA, the Company cleared the outstanding dues and requested CDSL to release the Ben-pos which was only released after the due date of the compliance lapsed.</p> <p>On receipt of SOP review notice from BSE Limited for the alleged non-compliance under the said regulation, the Company has made the payment of INR 21,240/- towards the fines levied and the waiver request application along with the requisite representations has also been submitted.</p> <p>However, no further correspondence was received from BSE in this regard.</p>




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 Practising 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 Practising Company Secretary on the actions taken by the listed entity
1	Regulation 18(2)(a) of (LODR) Regulations, 2015– The audit committee met three times in a year instead of four times	Year ended 31 st March, 2021	No action taken by the Company	According to explanation given by the company, it was not feasible to take corrective action
2	Regulation 31A(8) of (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	Year ended 31 st March, 2021	The Company submitted the intimation for receipt of request from the promoter seeking re-classification from “promoter” group to “non-promoter” to the stock exchange	The Company has taken action on realization of the unintentional delay caused.
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 (LODR) Regulations, 2015	Year ended 31 st March, 2021	No action taken by the Company	According to explanation given by the Company, it was not feasible to take corrective action

Place: Mumbai
Date: 26th May, 2022




Shreya Shah
Practising Company Secretary
ACS No.: 39409/CoP No.: 15859
UDIN: A039409D000398416