



INDIA STEEL
WORKS LTD
Inner Vision. Global Action.

COSEC/BSE/2021-22

The Corporate Relationship Department,
The Stock Exchange, Mumbai
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001.

25th August, 2021.

Scrip Code: 513361.

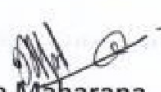
Dear Sir/ Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2020-21.

Kindly find enclosed herewith Annual Secretarial Compliance Report for the Financial Year 2020-21^{of} Ms. Reena T Parekh of M/s. Reena S Modi & Associates in terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

Please take the same on your records.

Thanking You,
Yours sincerely,
For India Steel Works Limited


Dilip Maharana
Company Secretary
ACS No.23014
Encl.: As above.

REGD. OFFICE & STEEL PLANT

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Raigad - 410 203, Maharashtra, India
T: +91 2192 265 812 F: +91 2192 264 061
CIN: L29100MH1987PLC043186

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REENA S MODI & ASSOCIATES
COMPANY SECRETARIES

Ms. Reena T Parekh
(Company Secretary, M.Com, LL.B)

Secretarial compliance report of **INDIA STEEL WORKS LIMITED** for the year ended March 31, 2021

(Pursuant to SEBI circular - CIR/CFD/CMD 1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To
INDIA STEEL WORKS LIMITED
Regd. Off: India Steel Works Complex
Zenith Compound
Khopoli MH 410203 IN.

CIN: L29100MH1987PLC043186
Authorized Share Capital: Rs.1, 07, 00, 00,000/-

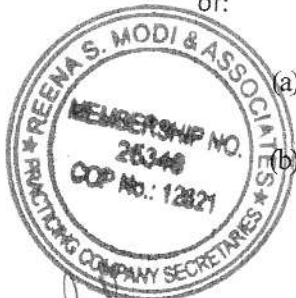
I, **Reena Parekh**, have conducted the Secretarial Compliance Audit of the applicable SEBI Regulation and the circular/guidelines issued thereunder for the Financial Year March 31st, 2021 of **INDIA STEEL WORKS LIMITED** ("the listed entity"). The audit was conducted in a manner that provided us a reasonable basis for evaluating the statutory compliances and expressing our opinion thereon.

We have examined:

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

for the year ended March 31st, 2021 ("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 Securities and Exchange Board of India Act, 1992 ("SEBI Act") 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;
- (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 to the company during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999-**not applicable to the company during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008-**(not applicable to the company during the review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;**(not applicable to the company during the review period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading)
- (i) Regulations, 2015;
- (j) The provision of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agent) Regulation, 1993;
- (i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

Based on our examination and verification of the documents and records produced to us according to the information and explanations given by the Company, we report that:

- (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	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 requires submission of the Quarterly Un-Audited standalone & Consolidated Financial Results with the Stock Exchange within 45 days from the end of June Quarter on or before 15/08/2020. Due to Covid-19 Pandemic, the period was extended up to 15/09/2020.	The Company has submitted Financial Results for the Quarter ended 30.6.2020 on 25 th September, 2020 beyond the stipulated period i.e which should have been submitted on or before 15.09.2020.	The Financial Results should have been filed on or before 15 th September, 2020. The Company has paid the penalty Rs.59000/- including GST levied for the non-compliance.
2	Regulation 33 of SEBI (Listing Obligations and Disclosure	The Company has submitted Financial	The Financial Results should have been filed

	Requirements) Regulation, 2015 requires submission of the Quarterly Un-Audited standalone & Consolidated Financial Results with the Stock Exchange within 45 days from the end of September Quarter i.e on or before 15/11/2020.	results for the Quarter ended 30.9.2020 beyond the stipulated period on 30.11. 2020 , which should have been submitted on or before 15.11. 2020.	on or before 15 th November, 2020. However It was submitted on 30.11.2020. For the delay in submission BSE has levied penalty Rs.76700/-including GST. The Company has paid the penalty levied for the non-compliance
3	Regulation 13(3) (Listing Obligations and Disclosure Requirements) Regulation, 2015 requires submission on quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, those disposed of during the quarter and those remaining unresolved at the end of the quarter. The statement for the September quarter should be submitted on or before 21/10/2020.	The Company has submitted the Statement under Regulation 13(3) for September Quarter on 22/10/2020.	The Statement should have been filed on or before 21/10/ 2020. However It was submitted on 22.10.2020. For the delay in submission BSE has levied penalty Rs.1180/-including GST. The Company has paid the penalty levied for the non-compliance
4.	Regulation 31 Listing Obligations and Disclosure Requirements) Regulation, 2015 requires submission of shareholding pattern. within twenty one days from the end of September 2020 quarter i.e on or before 21/10/2020.	The Company has submitted the Shareholding Pattern under Regulation 31 for September Quarter on 22/10/2020.	The Shareholding Pattern should have been filed on or before 21/10/ 2020. However It was submitted on 22.10.2020. For the delay in submission BSE has levied penalty Rs.2360/-including GST. The Company has paid the penalty levied for the non-compliance
5	Regulation 6(1) Listing Obligations and Disclosure Requirements) Regulation, 2015 requires appoint of a qualified company secretary as the compliance officer.	The Company Secretary resigned effective 04.03.2020. The Company has appointed Company secretary on 31/07/2020.	The Company has received a mail dtd.20.11.2020 regarding noncompliance of Regulation 6(1) pertaining to appoint of a qualified company secretary as

			the Compliance officer imposing a penalty of Rs. 108560/-including GST. The penalty was waived later.
6	Regulation 7(1) Requires the Company should appoint share transfer agent.	Linkintime India Private Limited is the Share transfer agent of the Company since long. There was no deviation as such.	The Company has a Share transfer Agent. However, BSE had imposed a penalty of Rs.108560/-including GST for the quarter ended 30/09/2020, was waived later.
7.	Regulation 76 SEBI (Depositories and Participants) Regulations, 2018 requires submission of Reconciliation of share Capital audit Report within 30 days from the end of September quarter,2020.	The Company has submitted the Reconciliation of share Capital audit Report for the quarter ended 30.09.2020 on 19/11/2020 which should have been submitted on or before 30/10/2020.	The Company has submitted the Reconciliation of share Capital audit Report for the quarter ended 30.09.2020 on 19/11/2020 and there is a delay in the submission..
8.	Regulation 29(2)/29(3) requires at least five days in advance (excluding the date of the intimation and date of the meeting),prior intimation about the meeting of the board of directors should be given For the meeting held on February 13, 2021 for Financial Results for December 2020 quarter.	The Company has sent the intimation on 8/02/2021.	The intimation should have been sent on or before 07/02/2021. It was sent on 08/02/2021. per instance of non-compliance penalty Rs.11800/-including GST was levied. The Company has paid the same.

(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/our 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 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.

1	BSE Limited (BSE)	Non Compliance of Reg.33 of LODR Regulations 2015. The Company has submitted Financial Results for the Quarter ended 30.6.2020 on 25 th September, 2020 beyond the stipulated period i.e which should have been submitted on or before 15.09. 2020. It was submitted on 25.09.2020.	Penalty Rs.59000/- including GST levied for the non-compliance.	The Financial Results should have been filed on or before 15 th September, 2020.It was submitted on 25.09.2020. The Company has paid the penalty Rs.59000/- including GST levied for the non-compliance & complied with the provision. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange.
2.	BSE Limited (BSE)	Non Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation,2015 requiring submission of the Quarterly Un-Audited standalone & Consolidated Financial Results with the Stock Exchange within 45days from the end of September Quarter i.e on or before 15/11/2020. However It was submitted on 30.11.2020	For the delay in submission BSE has levied penalty Rs.76700/- including GST. The Company has paid the penalty levied for the non-compliance.	The Financial Results should have been filed on or before 15 th November, 2020. However It was submitted on 30.11.2020.For the delay in submission BSE has levied penalty Rs.76700/- including GST. The Company has paid the penalty levied for the non-compliance. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange
3	BSE Limited (BSE)	Non Compliance of Regulation 13(3) (Listing Obligations and Disclosure Requirements) Regulation, 2015 requiring submission on quarterly basis, within twenty one days from the end of each quarter,	For the delay in submission BSE has levied penalty Rs.1180/- including GST.	The Statement should have been filed on or before 21/10/ 2020. However It was submitted on 22.10.2020.For the delay in submission BSE has levied

		<p>a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter. The statement for the September quarter should be submitted on or before 21/10/2020. However It was submitted on 22.10.2020.</p>		<p>penalty Rs.1180/- including GST. The Company has paid the penalty levied for the non-compliance. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange</p>
4.	BSE Limited (BSE)	<p>Non-compliance of Regulation 31 Listing Obligations and Disclosure Requirements) Regulation, 2015 requiring submission of shareholding pattern. within twenty one days from the end of September 2020 quarter i.e on or before 21/10/2020.However It was submitted on 22.10.2020.</p>	<p>BSE has levied penalty Rs.2360/- including GST. The Company has paid the penalty levied for the non-compliance</p>	<p>The Shareholding Pattern should have been filed on or before 21/10/ 2020. However It was submitted on 22.10.2020.For the delay in submission BSE has levied penalty Rs.2360/- including GST. The Company has paid the penalty levied for the non-compliance. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange</p>
5	BSE Limited (BSE)	<p>Regulation 6(1) Listing Obligations and Disclosure Requirements) Regulation,2015 requires appoint of a qualified company secretary as the compliance officer.</p>	<p>BSE has imposed a penalty of Rs. 108560/- including GST.</p>	<p>The Company Secretary resigned effective 04.03.2020. The Company has appointed Company secretary on 31/07/2020. The Company has received a mail dtd.20.11.2020 regarding noncompliance of Regulation 6(1)pertaining to</p>

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				appoint of a qualified company secretary as the Compliance officer imposing a penalty of Rs. 108560/-including GST. The penalty was waived later as there was a Company Secretary & Compliance officer. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange
6.	BSE Limited (BSE)	Regulation 7(1) Requires the Company should appoint share transfer agent.	BSE had imposed a penalty of Rs.108560/- including GST.	The Company has a Share transfer Agent. However, BSE had imposed a penalty of Rs.108560/-including GST for the quarter ended 30/09/2020, was waived later as there was share transfer agent. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange
7.	BSE Limited (BSE)	Non-Compliance of Regulation 76 SEBI (Depositories and Participants) Regulations, 2018 requiring submission of Reconciliation of share Capital audit Report within 30 days from the end of September quarter,2020.	There was no penalty levied for late submission of Reconciliation of share Capital audit Report .	The Company has submitted the Reconciliation of share Capital audit Report for the quarter ended 30.09.2020 on 19/11/2020 which should have been submitted on or before 30/10/2020. There was a delay. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange

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8.	BSE Limited (BSE)	Non-compliance of Regulation 29(2)/29(3) requiring at least five days in advance (excluding the date of the intimation and date of the meeting), prior intimation about the meeting of the board of directors should be given For the meeting held on February 13, 2021 for Financial Results for December 2020 quarter.	BSE per instance of non-compliance imposed penalty Rs.11800/- including GST.	The intimation should have been sent on or before 07/02/2021. It was sent on 08/02/2021. per instance of non-compliance penalty Rs.11800/-including GST was levied. The Company has paid the same. The Board has taken note of the non-compliance and intimated the same to the Stock Exchange
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(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 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non Compliance under Regulation 17 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 pertaining to Composition of Board	Pertaining to Composition of Board.	Fine Amount-was imposed on the Company.	The company has complied with the provision and also paid as fine Amount to BSE.

2.	Non Compliance under Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 pertaining to Annual Audited standalone Financial results	Pertaining to Financial results.	Fine Amount-was imposed on the Company.	The company has complied with the provision and also paid as fine Amount to BSE.
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Note: Due to the outbreak of COVID-19 pandemic and the current lockdown, physical examination of documents under the SEBI Act and Regulations is not possible; we have therefore relied upon the documents provided by the Company in electronic mode for Audit purpose.

For M/s.Reena S Modi & Associates
Practicing Company Secretary

Reena Parekh

Reena T Parekh
Proprietor
ACS No.: A25346
C. P. No.:12621

UDIN: A025346C000813089

Place: Mumbai

Date: 20/08/2021

