



**C.S. Amarendra Mohapatra**  
**M.Com, L.L.M., A.C.S.**

**\*Amarendra Mohapatra & Associates**  
**Practicing Company Secretaries\***  
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Secretarial compliance report of [SCAN STEELS LIMITED] for the year  
Ended 31.03.2021

To,  
SCAN STEELS LIMITED  
104-105, "E-Square"  
Subhash Road,  
Opp. Havmor ice- cream,  
Vile- Parle (E),  
Mumbai - 400057.

I/CS Amarendra Mohapatra, Prop. Of M/s. Amarendra Mohapatra & Associates, have examined:

- All the documents and records made available to me and explanation provided by [SCAN STEELS LIMITED] ("the listed entity"),
- The filings/submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended [31.03.2021] ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- The securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- Securities and Exchange Board of India (listing Obligations and Disclosure Requirements) Regulations, 2015 to the extent applicable;  
Securities and Exchange Board of India (Issued of Capital and Disclosure Requirement) Regulations, 2018; (Not Applicable to the company during the audit period)
- Securities and Exchange Board of India (Substantial Acquisition of shares and Takeovers) Regulations, 2011 to the extent applicable;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the company during the audit period)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulation, 2014 (Not Applicable to the Company during the audit period)

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- (e) Securities and Exchange Board of India (Issue and Listing of debt Securities) Regulations, 2008; **(Not Applicable to the Company during the audit period)**
- (f) 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 audit period)**
- (g) Securities and Exchange Board of India (Prohibition of insider Trading) Regulations, 2015; to the extent applicable
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not Applicable to the company during the audit period);**
- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (j) SEBI (Depositories and Participant) Regulations, 2018; to the extent applicable.
- (k) Foreign Exchange Management Act, 1999 and the Rules and Regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; **(Not Applicable to the company during the audit period);**

And circulars/ guidelines issued there under;

And based on the above examination, 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 there under, 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
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ by SEBI under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under; -

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 31.03.2020 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	SEBI - by ADJUDICATION ORDER NO. - Order /KS/AA/2019-20/6513 dated 23.01.2020 had levied a penalty of Rs. 18.80 lakh under the provisions of section 15HA of the SEBI Act for indulging in fraudulent trading in the stock options segment of the BSE, between April 2014 and September 2015 that created large scale reversal of trades in stock options segment of the BSE and led to creation of artificial trading volumes in the stock options contracts that violated the provisions of PFUTP (Prohibition of Fraudulent and Unfair Trade Practices) norms.	As per the discussion held with the company Management - it was observed that the Company is aggrieved with this order, and had filed appeal under Securities Appellate Tribunal against the aforementioned order.	The Company had remitted sum of Rs. 21, 13,399/- (Rupees Twenty One Lakh Thirteen Thousand Three Hundred and Ninety Nine Only) along with the interest from the date of order @12 % p.a . towards penalty levied on them against Adjudication order bearing ref no : Order/KS/AA/2019-20/6513 dated January 23, 2020 in the matter of Trading in Illiquid Stock Options on BSE	The Company has remitted the penalty but it is observed that Such remittance is without prejudice and not to be deemed as admission in any manner by the Company. The decision of Hon'ble SAT is awaited in the appeal filed by the company and shall not prejudice company's rights in any manner whatsoever.

Place: Bhubaneswar

For M/s. Amarendra Mohapatra & Associates  
Practicing Company Secretaries

Date: 22/04/2021

UDIN: A026257C000160644



(CS. Amarendra Mohapatra)

Company Secretary  
Membership No. : A26257  
C.P.No.:14901