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**Secretarial compliance report
of**

M/s. Steel City Securities Limited for the year ended 31st March, 2019

To,
Steel City Securities Limited
CIN: L67120AP1995PLC019521
49-52-5/4, Shantipuram,
Visakhapatnam-530016,
Andhra Pradesh, India

We, M/s ASN Associates, have examined:

- all the documents and records made available to us and explanation provided by M/s. Steel City Securities 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 31st March, 2019 ("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;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018
and circulars/ guidelines issued there under;

and based on the above examination, We 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 / Remarks of the guidelines including specific clause)	Deviations	Observations/ Remarks of Practicing Company Secretary

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from 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 there under:

Sr. No.	Action taken by	Details of Violation	Details of Action taken, e.g. fines, warning letters, debarment etc	Observations / remarks of the Practicing Company Secretary, if any
1.	National Stock Exchange of India Limited	Delayed compliance with regard to regulation 13(3) of SEBI (LODR) Regulations for a period of 3 days	The Exchange has levied a penalty of Rs. 3000/- plus GST	First time by the company and assures to strictly comply the same next time



(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	Action taken by the listed entity, if any	Comments of the Practicing company Secretary on actions taken by the listed entity
Not Applicable				

For ASN Associates

Signature:



Name of the Practicing Company Secretary: K Surendra
M No: 34205 CP No: 12732

Place: Visakhapatnam

Date: 29.05.2019