KUCHIPUDI SURENDRA
COMPANY SECRETARY

ASN ASSOCIATES
COMPANY SECRETARIES

(O) : 2529246
Fax : 0891-2712695
Cell : 9640056555, 7799435494
email : asn@asnassociates.com

Secretarial Compliance Report
of Steel City Securities Limited for the financial year ended 31.03.2026

To
Steel City Securities Limited
CIN: L67120AP1995PLC019521
Registered Office: Steel City Heights,
50-81-18, Main Road, Seethammapeta,
Visakhapatnam (Urban)-530016, Andhra Pradesh, India

We M/s ASN Associates, have examined:

(a) all the documents and records made available to us and explanation provided **Steel City Securities Limited** ("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 31st March, 2026 ("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 specific Regulations, whose provisions 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;

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE M.No: 34205 C.P.No: 12732

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(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 Securities) Regulations, 2021;

(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 (other regulations as applicable) and circulars/ guidelines issued thereunder

(j) Securities and Exchange Board of India (Stock Brokers) Regulations, 1992

(Note: The aforesaid list of Regulations is only illustrative. The list of such SEBI Regulations, as may be relevant and applicable to the listed entity for the review period, shall be added.)

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Nil
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes	Nil

COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
C.P.No: 12732
K. SURENDRA

3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ informationunder a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website	Yes	Nil
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	Nil
6.	**Preservation of Documents:** The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Nil
7.	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of AuditCommittee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been	Yes	Nil

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
CP.No: 12732

	obtained.		
9.	**Disclosure of events or information:** The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Nil
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	Yes	Nil
12.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Nil

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	**Compliances with the following conditions while appointing/re-appointing an auditor**		

COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
CP.No: 12732
K. SURENDRA
★

	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the auditreport for such financial year.	NA	There was no resignation of auditors
2.	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the AuditCommittee: a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.	NA	There was no resignation of auditors

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
C.P.No: 12732

	b. In case the auditor proposes to resign,all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable. **c.** The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information fromthe auditor relating to the proposal to resignas mentioned above and communicate itsviews to the management and the auditor. **ii.** Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	NA	There was no resignation of auditors
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	There was no resignation of auditors

*Observations /Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

(a) (**) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelinesissued thereunder, except in respect of matters specified below:

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
CP.No: 12732

Sr. No.	Compliance Requirement (Regulations/ circulars/guide-lines including specific clause)	Regulation/ CircularNo.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Submission of annual secretarial compliance report by the company within 60 days from the end of the financial year under Regulation 24A of SEBI (LODR) Regulations, 2015	Regulation 24A of SEBI (LODR) Regulations, 2015	Delayed submission of annual secretarial compliance report	NSE	Fine vide notice NSE/LIST - SOP/FINES/0704 dated 26.06.2025	The Company has submitted the annual secretarial compliance report for the financial year ended 31.03.2025 with 17 days delay	Rs 40,120/-	The Company has delayed submitted the annual secretarial compliance report with the NSE. The penalty has been paid on 30.09.2025.	The penalty has been paid on 30.09.2025 The Company shall take all the necessary steps to avoid delayed submissions in future	The penalty has been paid on 30.09.2025

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

Sr. No.	Compliance Requirement (Regulations/ circulars/guide-lines including specific clause)	Regulation/ CircularNo.	Deviations	Action Takenby	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE M.No: 34205 CP.No: 12732

ASN ASSOCIATES
COMPANY SECRETARIES

Continuation Sheet............

1.	Submission of corporate governance compliance report by the company within 21 days from the end of the quarter under Regulation 27(2) of SEBI (LODR) Regulations, 2015	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delayed submission of corporate governance compliance report	NSE	Fine vide notice dated 22.05.2024	The Company has submitted the corporate governance compliance report for the quarter 31.03.2024 with two days delay	Rs 4000/-	The Company has delayed submitted the corporate governance compliance report with the NSE. The penalty has been paid on 04.06.2024.	The penalty has been paid on 04.06.2024 The Company shall take all the necessary steps to avoid delayed submissions in future	The penalty has been paid on 04.06.2024
2.	SEBI Act, 1992 and SEBI (Intermediaries) Regulations, 2018	SEBI Act, 1992 and SEBI (Intermediaries) Regulations, 2018	Allegation that Mr Satish Kumar Arya failed to satisfy the criteria for 'fit and proper person' and the Company failed to replace its Director, Mr Satish Kumar Arya as mandated under the Intermediaries Regulations	SEBI	Order dated 23.09.2024	Pertaining to submission of fake/non genuine degree certificate by Mr Satish Kumar Arya, Director, he failed to satisfy the criteria for 'fit and proper person' and the Company failed to replace its Director, Mr Satish Kumar Arya as mandated under the Intermediaries	Nil	SEBI vide its order no WTM/AN/MIRSD/MIRSD-RAC-1/30805/2024-25 directed 1. the Company is censured and warned to be careful and diligent in the conduct of all its business 2. the Company shall not employ/engage/associate with Mr Satish Kumar Arya,	The Company has complied with the SEBI order and the Company did not engage/employ/associate with Mr Satish Kumar Arya, Managing Director and CEO, with respect to any of its functions, directly or indirectl	-

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
CP No: 12732

						Regulations		Managing Director and CEO, with respect to any of its functions, directly or indirectly, for a period of 1 month. Accordingly, the Company has complied with the SEBI Order. As per the information and documents provided by the Company's management, the Company did not engage/employ/associate with Mr Satish Kumar Arya, Managing Director and CEO, with respect to any of its functions, directly or indirectly, for a period of 1 month and his powers	y, for a period of 1 month and his powers have been given to the executive chairman during the said period The Company shall take all the necessary steps to be careful and diligent in the conduct of all its business	

K. SURENDRA COMPANY SECRETARY IN WHOLE TIME PRACTICE
M. No: 34205
C.P. No: 12732

								have been given to the executive chairman during the said period.		
3.	Submission of Annual Report to the Stock exchange Regulation 27(2) of SEBI (LODR) Regulations, 2015	Regulation 34 of SEBI (LODR) Regulations, 2015	Delayed submission of annual report	NSE	Fine vide notice dated 21.10.2024	The Company has submitted the annual report for the financial year ended 31.03.2024 with one day delay	Rs 2000/-	The Company has delayed submitted the annual report with the NSE. The penalty has been paid on 04.11.2024	The penalty has been paid on 04.11.2024 The Company shall take all the necessary steps to avoid delayed submissions in future	The penalty has been paid on 04.11.2024

For Asn Associates

Signature:
Name of the Practicing Company Secretary : K Surendra
ACS/FCS No : 34205
C P No : 12732
UDIN : A034205H000244140

COMPANY SECRETARY IN WHOLE TIME PRACTICE
M.No: 34205
CP.No: 12732
K. SURENDRA

Place: Visakhapatnam
Date: 02.05.2026