



# Steel Exchange India Limited

Regd. Office : D.No:1-65/K/60, Plot No:60, Abhis Hiranya, 1<sup>ST</sup> Floor, Kavuri Hills, Hyderabad- 81TS.

Phone: +91-40-23403725, 23413267, 40033501

Corp. Office : Block-A, Green City Towers, Green City, Vadlapudi, Visakhapatnam-530049, A.P

Phone: +91-891-2587175, 2749215, [www.seil.co.in](http://www.seil.co.in), **E-mail** : [info@seil.co.in](mailto:info@seil.co.in)

GSTIN : 36AABCP9362L1ZX & 37AABCP9362L1ZV

CIN : L74100TG1999PLC031191

**May 30, 2025**

To  
The Manager,  
Department of Corporate Services,  
BSE Limited  
P.J. Towers, Dalal Street,  
Port, Mumbai – 400001

To  
The Manager,  
Listing Department,  
National Stock Exchange of India Limited,  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai – 400051

**Scrip Code: 534748**

**Scrip Code: STEELXIND**

**Subject:** Annual Secretarial Compliance Report for the year ended March 31, 2025 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulation")

Dear Sir/Ma'am,

Please find enclosed herewith Annual Secretarial Compliance Report of the Company issued by B S S & Associates, Practicing Company Secretaries, for Financial Year ended March 31, 2025, pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulation") read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

The above said report also uploaded on Company's website at <https://www.seil.co.in/>.

We request you to take the same on your records.

Yours faithfully,

Thanking You,

For **Steel Exchange India Limited**

**Raveendra Babu M**

Company Secretary & Compliance Officer

M.No: A34409

**WORKS**

**Integrated Steel Plant:** Sreerampuram, L.Kota Mandal, Vizianagaram District - 535161. Phone: +91-8966-267218, 267111



# B S S & ASSOCIATES

## COMPANY SECRETARIES

Flat No. 5A, Parameswara Apartments, Beside SBI, Anandnagar, Khairatabad, Hyderabad-500 004

Phone : 040 - 40171671, Cell : 6309490217

E-mail : cs@bssandassociates.com

### Secretarial Compliance Report of Steel Exchange India Limited for the year ended March 31, 2025

To,  
**Steel Exchange India Limited,**  
(CIN: L74100TG1999PLC031191)  
D.NO:1-65/K/60, Plot No: 60 Abhis Hiranya,  
1st Floor, Kavuri Hills, Hyderabad, Telangana, India, 500081.

We, B S S & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Steel Exchange India 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 Considered relevant, which has been relied upon to make this Certificate,

for the financial year ended March 31, 2025 ("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 - Not applicable during the Review Period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - Not applicable during the Review Period;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - Not applicable during the Review Period;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) other regulations as applicable.

and circulars/ guidelines issued thereunder;

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 thereunder, except in respect of matters specified below:

S. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
Nil										

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

S. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2025 (The years are to be mentioned)	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Primarily, the Company had applied for trading approval on 21.07.2023, which got rejected by the stock exchanges due to the absence of the credit confirmation from the depositories. Subsequently	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this lapse respectively on 28.08.2024 and 21.08.2024.	As per Master Circular Dated 21.06.2023 No: SEBI/ HO/ CFD/ PoD- 2/ P/ CIR/ 2023/ 00094 All the Listed entities shall make an application for trading approval to the stock exchange/s within 7 working days from the date of grant of	Company has made proper application for Trading approval on 06.01.2024 i.e., after 7 days from the date of Listing Approval, for the allotment of 9,58,00,000 equity shares as a result of conversion of CCDs. No. of Days Delayed: 166 days penalty imposed	The Company has taken note of the same and assured strict compliance in future.	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this





S. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2025 (The years are to be mentioned)	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	company has filed proper application on 06.01.2024 with all the requisite documents, which got delayed due to rejection of first application		listing approval by the stock exchange/s.	NSE: Rs. 39,17,600/- & BSE: Rs. 39,17,600/-		lapse respectively on 28.08.2024 and 21.08.2024
2.	Primarily, the Company had applied for trading approval on 26.07.2023, which got rejected by the stock exchanges due to the absence of the credit confirmation from the depositories. Subsequently company has filed proper application on 06.01.2024 with all the requisite documents, which got delayed due to rejection of first application	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this lapse respectively on 28.08.2024 and 21.08.2024	As per Master Circular Dated 21.06.2023 No: SEBI/ HO/ CFD/ PoD- 2/ P/ CIR/ 2023/ 00094 All the Listed entities shall make an application for trading approval to the stock exchange/s within 7 working days from the date of grant of listing approval by the stock exchange/s.	Company has made proper application for Trading approval on 06.01.2024 i.e., after 7 days from the date of Listing Approval, for the allotment of 7,58,00,000 equity shares as a result of conversion of CCDs. No. of Days Delayed: 163 days penalty imposed NSE: Rs. 38,46,800/- & BSE: Rs. 38,46,800/-	The Company has taken note of the same and assured strict compliance in future.	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this lapse respectively on 28.08.2024 and 21.08.2024
3.	Primarily, the Company had applied for trading approval on 26.07.2023, which got rejected by the stock exchanges due to the absence of the credit confirmation from the depositories. Subsequently company has filed proper application on 12.01.2024 with all the requisite documents, which got delayed due to rejection of first application.	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this lapse respectively on 28.08.2024 and 21.08.2024	As per Master Circular Dated 21.06.2023 No: SEBI/ HO/ CFD/ PoD- 2/ P/ CIR/ 2023/ 00094 All the Listed entities shall make an application for trading approval to the stock exchange/s within 7 working days from the date of grant of listing approval by the stock exchange/s.	Company has made proper application for Trading approval on 12.01.2024 i.e., after 7 days from the date of Listing Approval, for the allotment of 1,30,00,000 equity shares. No. of Days Delayed: 169 days penalty imposed NSE: Rs. 39,88,400/- & BSE: Rs. 39,88,400/-	The Company has taken note of the same and assured strict compliance in future.	No further comments, as the Company has paid the levied penalty to National Stock Exchange of India Limited & BSE Limited and rectified this lapse respectively on 28.08.2024 and 21.08.2024
4.	Primarily, the Company had applied for Listing approval on 10.06.2023, which got approved by BSE on 18.07.2023,	No further comments, as the Company paid the penalties for the aforementioned non-compliances, consequently, the lapses have been rectified.	As per Master Circular Dated 21.06.2023 No: SEBI/ HO/ CFD/ PoD- 2/ P/ CIR/ 2023/ 00094 Issuer shall make an application to the exchange/s for listing in case of further issue	Company has made proper application for Listing approval with the NSE on 13.02.2024 i.e., after 20 days from the date of Allotment, for the allotment of 5,82,21,500 equity shares	The Company has taken note of the same and assured strict compliance in future.	No further comments, as the Company paid the penalties for the aforementioned non-





S. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2025 (The years are to be mentioned)	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	however it got rejected by the NSE due to pendency of existing Trading approvals. Subsequently company has filed another application on 13.02.2024, which got delayed due to rejection of first application.		of equity shares within 20 days from the date of allotment			compliances, consequently, the lapses have been rectified.
5.	No further comments, as the Company has paid the levied penalty to BSE Limited.	No further comments, as the Company has paid the levied penalty to BSE Limited and rectified this lapse on 30.12.2023.	The listed entity, while submitting quarterly and annual financial results, shall disclose the financial ratios stated in the regulation Regulation 52(4) SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015	The Financial Results for the quarter/half year ended September 2023, submitted by the Company to the Exchange does not contain the line items required to be given as per Regulation 52(4) of SEBI LODR viz., outstanding redeemable preference shares and capital redemption reserve / debenture redemption reserve penalty imposed BSE: Rs. 36,580/-	The Company has taken note of the same and assured strict compliance in future.	No further comments, as the Company has paid the levied penalty to BSE Limited and rectified this lapse on 30.12.2023.

We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS
1.	<b>Secretarial Standard:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	Nil
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Nil





3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents/ information under a separate section on the website.</li> <li>• 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.</li> </ul>	Yes	Nil
4.	<b>Disqualification of Director:</b> None of the Director(s) of the listed entity is / are disqualified under Section 164 of Companies Act, 2013. as confirmed by the listed entity.	Yes	Nil
5.	<b>To examine details related to Subsidiaries of listed entities:</b> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	Not Applicable during the period under review.
6.	<b>Preservation of Documents:</b> 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.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit committee.	Yes	Nil  There were no such transactions during the review period.
9.	<b>Disclosure of events or information:</b> 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.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	Nil
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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	Yes	Nil





	SEBI Regulations and circulars/ guidelines issued thereunder. (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.		
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There were no such events during the review period.
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	No additional non-compliance observed for all SEBI regulation / circular / guidance note etc.

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

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. - NA

**Assumptions & limitation of scope and review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For B S S & Associates  
Company Secretaries



S. Srikanth

S. Srikanth  
Partner

ACS No.: 22119 || C.P. No.: 7999

UDIN: A022119G000486473

Peer Review No: 6513/2025

Date: 29/05/2025

Place: Hyderabad