

May 25, 2019

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001

 Subject: Annual Secretarial Compliance Report pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations")

 Ref.:
 SEBI Circular- CIR/CFD/CMD1/27/2019 dated February 08, 2019

 Scrip Code:
 532001 ISIN : INE146H01018

With reference to the captioned subject and in compliance with SEBI Circular- CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed Annual Secretarial Compliance Report pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations").

Kindly take the same on record

The above is for your information.

Thanking you. Yours faithfully, For **Inducto Steel Limited**

A.H.DOSW

Arpita Doshi Company Secretary and Compliance Officer

> Registered Office: 156, Maker Chambers VI, 220, Jamnalal Bajaj Marg, Nariman Point, Mumbai– 400 021. Tel.- 022 - 22043211 Fax– 22043215 E-mail: contact@hariyanagroup.com Web Site: www.hariyanagroup.comCIN NO.: L27100MH1988PLC194523 ISO 9001:2015/ ISO 14001:2015/ OHSAS 18001:2007

Dilip Bharadiya B.Com., A.C.A., F.C.S. Proprietor

DILIP BHARADIYA & ASSOCIATES COMPANY SECRETARIES

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SECRETARIAL COMPLIANCE REPORT

of

INDUCTO STEEL LIMITED for the year ended 31st March 2019

We have examined:

- (a) all the documents and records made available to us and explanation provided by INDUCTO STEEL 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, 2019 ("period under review") 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (NOT APPLICABLE)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (NOT APPLICABLE)
- (g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; (NOT APPLICABLE)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018



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Admn Office 124 Nee Cornerate Plaza Onn Conal Pharuan Kanchnada Link Road Malad (M) Mumbai 400 064

Continuation Sheet....

DILIP BHARADIYA & ASSOCIATES COMPANY SECRETARIES

(j) and circulars/guidelines issued thereunder;

and based on the above examination, We hereby report that, during the period under review:

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- (a) The Listed Entity has complied with the provisions of the above Regulations and circulars/guidelines issued there under.
- (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 our examination of those records.
- (c) There have been no actions taken against the Listed Entity / its promoters/ directors 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.
- (d) This being first report of its kind, the Listed Entity has no observations to comply with, in accordance with the previous such reports.

For DILIP BHARADIYA & ASSOCIATES

Place : Mumbai Date : 23rd May, 2019 DILIP BHARADIYA Proprietor

FCS No.: 7956., C P No.: 6740



