

Secretarial Compliance Report of

WELCAST STEEL LIMITED

for the year ended 31st March, 2021

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated 08th February, 2019

We M/s. Tushar Vora & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by WELCAST Steel Limited ("the listed entity"),
- (b) the filings/ submission 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,

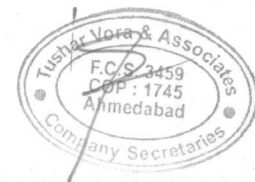
for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of :

- (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; (Not attracted during the year under review)
- (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 attracted during the year under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not attracted during the year under review)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not attracted during the year under review)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not attracted during the year under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued there under;



and based on the above examination and explanation / clarification given by the Company and its officers, I hereby report that, during the Review Period:

(a) The listed entity has, subject to certain interpretation matters, complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviation	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			

(b) The listed entity has generally maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of the records produced before us.

(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 thereunder:

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				

* As informed to us, no such actions have been taken against the Company / its promoters, / directors etc.

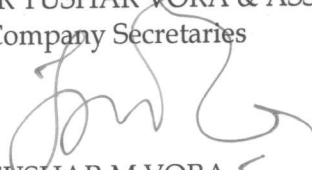
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (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
Not Applicable				

22nd May, 2021
Ahmedabad



FOR TUSHAR VORA & ASSOCIATES
Company Secretaries


TUSHAR M VORA
Proprietor
FCS No. 3459
C P No.: 1745
UDIN: F003459C000358660