

AKC STEEL INDUSTRIES LIMITED

Regd. Office: Lansdowne Towers, 4th Floor, 2/1A, Sarat Bose Road, Kolkata - 700 020 Tel.: 033-40604444, Fax: 033 2283 3322, E-mail: contact@akcsteel.com, Website: www.akcsteel.com CIN: L27109WB1957PLC023360

Ref: AKCSIL /RKS/SCR/ REG-24A/2025-26/ 030

Dated: 22.05.2025

To The Secretary The Calcutta Stock Exchange Limited 7, Lyons Range, Dalhousie Kolkata-700001

Ref: Scrip Code: - 011019

Dear Sir/Madam,

Sub: - Submission of Annual Secretarial Compliance Report from Practicing Company Secretary under Regulation 24A of the Securities and Exchange Board of India [LODR] Regulations, 2015 for the year ended on March 31, 2025

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the applicable Circulars issued by the Securities and Exchange Board of India, we are submitting herewith a copy of the Annual Secretarial Compliance Report of AKC Steel Industries Limited issued by Mr. Santosh Kumar Tibrewalla, Practicing Company Secretary (FCS No. 3811) for the year ended on March 31, 2025.

This is for your information and records.

Thanking you,

Yours faithfully.

For AKC Steel Industries Ltd.

REKHA SHAW Digitally signed by REKHA SHAW BARAD Date: 2025.05.22 **BARAD** 16:24:57 +05'30'

(Rekha Shaw Barad) Company Secretary & Compliance Officer

Enclosure: As above



Works: Malkapuram Post, Visakhapatnam - 530 011, A. P., Tel.: 0891 2577481 / 82 / 83 • Fax: 0891 2577796 Workshop: Plot No.: 223, Block - D, Autonagar Yard, Visakhapatnam - 530012, A.P., Tel.: 0891 2756209/2511595 • Fax: 0891 2756209

5A, N. C. Dutta Sarani, 3rd Floor, Kolkata - 700 001 Phone: 033 40054842

Email: santibrewalla@rediffmail.com

<u>Secretarial Compliance Report of A K C Steel Industries Limited</u> <u>for the year ended 31st March, 2025</u>

[Under regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015]

I, Santosh Kumar Tibrewalla, Secretarial Auditor of AKC Steel Industries Limited, have examined:

- a. all the documents and records made available to me and explanation provided by A K C Steel Industries Limited ("the listed entity") having its registered Office at Lansdowne Towers, 2/1A, Sarat Bose Road, 4th Floor, Kolkata - 700020,
- b. the filings/ submissions made by the Company to the Stock Exchange(s),
- c. website of the Company,
- d. any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended 31st March, 2025 ("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 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, to the extent applicable, which 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
- 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 and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder.

and based on the above examination, I 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: —

Sr. 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
				N	ot Appli	cable				

(b) 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 the previous reports	Observations made in the secretarial compliance report for the year ended	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
			Not Applicable			

(c) I hereby report the compliance status of the listed entity with the following requirements during the Review Period:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	Secretarial Standards:		100
	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	-
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.	Yes	-
	 All the policies are in conformity with SEBI Regulations and has been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes	*
3.	Maintenance and disclosures on Website:		
	The Listed entity is maintaining a functional website.	Yes	Ţ
	• Timely dissemination of the documents/ information under a separate section on the website.	Yes	-
	• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to	Yes	
	the relevant document(s)/ section of the website.		>



5.	None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. 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. Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per	Yes	The listed entity does not have any material subsidiary(ies) during the Review Period.
	Section 164 of Companies Act, 2013 as confirmed by the listed entity. 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. Preservation of Documents: The listed entity is preserving and maintaining records as		entity does not have any material subsidiary(ies) during the
	w.r.t: (a) Identification of material subsidiary companies; (b) Disclosure requirement of material as well as other subsidiaries. Preservation of Documents: The listed entity is preserving and maintaining records as		entity does not have any material subsidiary(ies) during the
6.	 (a) Identification of material subsidiary companies; (b) Disclosure requirement of material as well as other subsidiaries. Preservation of Documents: The listed entity is preserving and maintaining records as 		have any material subsidiary(ies) during the
6.	(b) Disclosure requirement of material as well as other subsidiaries. Preservation of Documents: The listed entity is preserving and maintaining records as		material subsidiary(ies) during the
6.	Subsidiaries. Preservation of Documents: The listed entity is preserving and maintaining records as	Yes	during the
6.	Subsidiaries. Preservation of Documents: The listed entity is preserving and maintaining records as	Yes	
0.	The listed entity is preserving and maintaining records as	Yes	
1 1	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.		
7.	Performance Evaluation:	Yes	-
	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees in every financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions;	Yes	
	(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.	NA	No such instance(s) observed.
9.	Disclosure of events or information:	Yes	-
	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.		,
10.	Prohibition of Insider Trading:	Yes	-
	The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.		
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 (or)	Yes	-
	The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	No action taken by SEBI/ SEs.

12.	Resignation of Statutory Auditors from the listed entity or its material subsidiaries:	NA	No resignation of Statutory
	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.		Auditors from the listed entity during the Review Period.
13.	Additional Non-compliances, if any:	Yes	-
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.		

Signature: (C. P. 3982 Pri

Date: 22.05.2025 Place: Kolkata

Name and Address of the Company Secretary issuing the Certificate:

Santosh Kumar Tibrewalla 5A, N. C. Dutta Sarani, 3rd floor, Kolkata - 700001

> F C S No.: 3811 C P No.: 3982

PR No.: 1346/2021

UDIN: F003811G000405751