

# ANURAG FATEHPURIA

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## SECRETARIAL COMPLIANCE REPORT OF GALLANTT METAL LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022

I, Anurag Fatehpuria, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **Gallantt Metal 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 31<sup>st</sup> March, 2022 ("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 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 Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 34 of the SEBI (LODR) Regulations, 2015	Delay in compliance of Regulation 34 of the SEBI (LODR) Regulations, 2015 by 2 days.	Company has paid the fine amount imposed by both BSE & NSE.

- 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 my/our examination of those records.
- 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
1	Bombay Stock Exchange Limited (BSE) and National Stock Exchange of India Limited (NSE).	Delay in compliance of Regulation 34 of the SEBI (LODR) Regulations, 2015.	Fine imposed by both BSE & NSE amounting to Rs. 4,720 each for two days delay in the said compliance.	Company has made payment of the fine amount imposed by BSE & NSE.

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 31 <sup>st</sup> March, 2021.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	There are no observations of Practicing Company Secretary in the previous reports except observation made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2021.	Fine imposed by both Bombay Stock Exchange Limited (BSE) and National Stock Exchange of India Limited (NSE) amounting to Rs. 4,41,320 each for non-compliance of Regulations 17(1), 18(1), 19(1)/ 19(2) and 20(2)/(2A) of the SEBI (LODR) Regulations, 2015.	Company has paid the fine amount imposed by BSE & NSE and complied with the requisite compliances. Further, Company has also applied for waiver of the fine amount to BSE & NSE as the non-compliance was caused solely due to the impact of Covid – 19 pandemic.	Company after making payment of the fine amount imposed by BSE & NSE has made a waiver application as per the SEBI SOP Circular dated January 22, 2020. On making the waiver application NSE has waived off the fines levied for non-compliance of Regulations 18, 19 and 20(2A) amounting to Rs. 2,40,720 and instructed Company to pay the fine levied for non-



				compliance of Regulation 17 only amounting to Rs. 2,00,600. Since Company has also already paid the entire fine amount, NSE has credited the waived off amount of Rs. 2,40,720 into the bank account of the Company.
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Date: 04.05.2022  
 Place: Kolkata



Anurag Fatehpuria

ANURAG FATEHPURIA  
 Membership No. 34471  
 COP No. 12855  
 UDIN: A034471D000266670