

# ANURAG FATEHPURIA

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

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I, **Anurag Fatehpuria**, Practicing Company Secretary have examined:

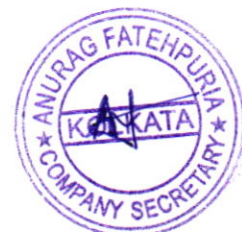
- (a) all the documents and records made available to us and explanation provided by **Gallantt Metal Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, 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- |



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|--|--|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  |  | <p>compliance of Regulation 17 only amounting to Rs. 2,00,600.</p> <p>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.</p> |
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Anurag Fatehpuria

Date: 04.05.2022  
Place: Kolkata

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