

**Secretarial Compliance Report of Impex Ferro Tech Ltd.  
for the year ended March 31, 2022**

We have examined:

- (a) all the documents and records made available to me and explanation provided by Impex Ferro Tech Ltd. ("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 March 31, 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 ("SEBI(LODR) Regulations, 2015");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the listed entity during the Review Period)
- (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 applicable to the listed entity during the Review Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the Review Period)



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the listed entity during the Review Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015;

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 30 read with Schedule III of SEBI (LODR) Regulations, 2015 for the submission of Financial Results for the quarter ended 30 <sup>th</sup> June, 2021.	Delayed in submission of Financial Results for the quarter ended 30 <sup>th</sup> June, 2021 to NSE by 3 minutes as required by Regulation 30 read with Schedule III of LODR-2015	As mentioned in Deviation.
2.	Regulation 34 of SEBI (LODR) Regulations, 2015 for submission of Annual Reports for the year ended 31 <sup>st</sup> March, 2021	Delayed in submission of Annual Reports for the year ended 31 <sup>st</sup> March, 2021 as required by Regulation 34 of SEBI (LODR) Regulations, 2015	As mentioned in Deviation

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my 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	NSE – E-mail dated 17 <sup>th</sup> January, 2022	Regulation 34 of SEBI (LODR) Regulations, 2015. Delayed in submission of Annual Reports for the year ended 31 <sup>st</sup> March, 2021.	Fine Imposed by NSE of Rs.23,600/-	Fine of Rs.23,600/- imposed by the NSE was paid by the Company on 3 <sup>rd</sup> February, 2022 through NEFT.
2	BSE – E-mail dated 17 <sup>th</sup> January, 2022	Regulation 34 of SEBI (LODR) Regulations, 2015. Delayed in submission of Annual Reports for the year ended 31 <sup>st</sup> March, 2021.	Fine Imposed by BSE of Rs.23,600/-	Fine of Rs.23,600/- imposed by the BSE was paid by the Company on 3 <sup>rd</sup> February, 2022 through NEFT.

- (d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

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-----				



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COMPANY SECRETARIES

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- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities" is not applicable during the Review Period.

Place : Kolkata  
Date : 26<sup>th</sup> May, 2022



K.C. DHANUKA & CO  
Company Secretaries

*K. C. Dhanuka*  
*26/05/2022*  
K. C. DHANUKA  
Proprietor  
FCS-2204, CP-1247  
Peer Reviewer No.108  
UDIN: F002204D000394035