



Pradeep Metals Limited
Manufacturers of Precision Closed Die Forgings

13th May, 2022

The Secretary
BSE Limited
P J Towers, Dalal Street,
Mumbai- 400 001.

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022

Scrip Code: 513532

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find enclosed the Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022, issued by M/s Shweta Gokarn & Co., Company Secretaries, dated 9th May, 2022.

Please take the same on record.

For **Pradeep Metals Limited**



Abhishek Joshi
Company Secretary & Compliance Officer
ACS: 64446

SHWETA GOKARN & CO.
COMPANY SECRETARIES

1405, Haware Infotech Park, Opp. Inorbit Mall, Sector 30A, Vashi, Navi Mumbai, 400 705
Tel:- +9122 4964 2406 Mobile:- +91 9920 999 686 www.shwetagokarn.com

SECRETARIAL COMPLIANCE REPORT

OF

PRADEEP METALS LIMITED FOR THE YEAR ENDED MARCH 31, 2022

I, Ms. Shweta Gokarn, Proprietor of Shweta Gokarn & Co., have examined:

- (a) All the documents and records made available to me and explanation provided by **M/s. Pradeep Metals Limited ("the Listed Entity/Company")**,
- (b) The filings/ submissions made by the Listed Entity to the stock exchange,
- (c) Website of the Listed Entity and
- (d) Representation letter issued by Management of the Listed Entity

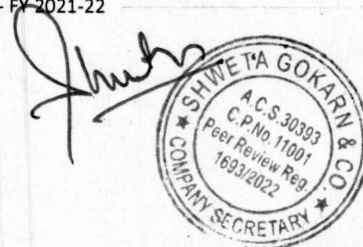
for the year ended March 31, 2022 ("**Review Period**") in respect of compliance with the provisions of:

1. The Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, circulars, guidelines issued thereunder; and
2. 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: -

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
2. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**Not Applicable to the Company during the Audit Period**);
3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
4. The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 (**Not applicable to the Company during the Audit Period**);

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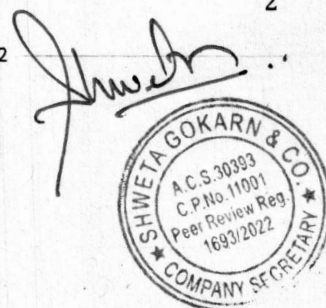


5. The Securities and Exchange Board of India (Shared based Employee Benefits) Regulations, 2014; (upto 12.08.2021) and The Securities and Exchange Board of India (Shared Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13.08.2021) **(Not Applicable to the Company during the Audit Period);**
6. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (upto 15.08.2021) and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16.08.2021) **(Not applicable to the Company during the Audit Period);**
7. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not applicable to the Company during the Audit Period);**
8. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
9. 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 **(Not applicable as the Company is not registered as Registrar & Transfer Agent) ;**
10. Securities And Exchange Board of India (Depositories and Participants) Regulations, 2018.

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:-~~

Compliance Requirement (Regulations/ circulars/guidelines including specific Clause)	Nil
Deviations	
Observations/ Remarks of the Practicing Company Secretary	



- (b) The Listed Entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under 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 there under:

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.
Nil				

- (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...	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
Nil				

For Shweta Gokarn & Co.
Company Secretaries
Peer Review Regn:1693/2022



Shweta

Ms. Shweta Gokarn
ACS: 30393
CP No: 11001

UDIN: A030393D000290191

Place: Navi Mumbai
Date: May 9, 2022

Note: This report is to be read with our letter of even date which is annexed herewith and forms an integral part of this report.

ANNEXURE TO SECRETARIAL COMPLIANCE REPORT

**The Members,
Pradeep Metals Limited,
R-205, MIDC Rabale,
Navi Mumbai – 400 701**

My report of even date is to be read along with this letter. This is to state that:

- a. Maintenance of secretarial/compliance records under all applicable SEBI Laws, Rules and Regulations is the responsibility of the management of the Company. My responsibility is to express an opinion on these records based on my audit.
- b. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial/compliance records. I believe that the processes and practices I followed provided a reasonable basis for my opinion.
- c. The compliance of the provisions of SEBI laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on test basis.
- d. Wherever required, I have obtained and relied on the Management representation made by the Company and its Officers for systems and mechanisms formed by the Company for compliances under other applicable Acts, Laws and Regulations to the Company.
- e. The Secretarial Compliance Report for the year ended March 31, 2022 is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For Shweta Gokarn & Co.
Company Secretaries
Peer Review Regn:1693/2022**



**Ms Shweta Gokarn
ACS: 30393
CP No: 11001
UDIN: A030393D000290191**

**Place: Navi Mumbai
Date: May 9, 2022**