



Advance Steel Tubes Ltd.

CIN : L2423IUP1978PLC004583

AN ISO 9001 : 2000 Company

Manufacturers of : 'ERW' M.S. Black & Galvanised Pipes,
Steel Tubular Poles, Steel Structures, Metal Crash Barrier & Scaffoldings



Sales Office : 81, FUNCTIONAL INDUSTRIAL ESTATE, PATPARGANJ, DELHI-110092

Phones : 011-43041400 (100 Lines) Fax : 91-11-22145978

Website : www.advance-india.com, www.advance.co.in

E-mail : info@advance.co.in

May 5, 2025

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

Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2025

Dear Sir/ Ma'am,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular no. CIR/CFD/CMDII2712019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Advance Steel Tubes Limited issued by Mr. Vipin Shukla, Practicing Company Secretary of M/s Vipin Shukla & Company for the financial year 2024-2025.

This is for your information and record.

Thanking you,
Yours Faithfully

For Advance Steel Tubes Limited

**DEOKI NANDAN
AGARWAL**

Digitally signed by DEOKI NANDAN AGARWAL
DN: cn=DEOKI NANDAN AGARWAL,
pseudoym=ada92028de8e4db7da5119ce80cf3e0,
2.5.4.20=f0ac62983e0916512169672e86ca225064209,
1122399aa5966b154da01ec70f, postalCode=110092,
st=Delhi,
serialNumber=e57ded0d010cf3054a74c52c0be5af9
f099a0b78e22c2921c280a671f4365a, cn=DEOKI
NANDAN AGARWAL
Date: 2025.05.05 17:10:29 +05'30'

(Deoki Nandan Agarwal)
Managing Director
DIN: 00586794

Encl: as above

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBHA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

Annual Secretarial Compliance Report

of Advance Steel Tubes Limited for the Financial Year ended 31-03-2025

To

The Members,

M/s Advance Steel Tubes Limited

Reg. Off.: 45/3, Industrial Area, Site IV,
Sahibabad, Ghaziabad
Uttar Pradesh – 2010120

We, Vipin Shukla & Company, a firm of practicing Company Secretaries have conducted the review of the compliances of the applicable statutory provisions and adherence to good corporate practices by M/s Advance Steel Tubes Limited herein after referred to as the 'Listed entity' or 'company' having its registered office at Reg. Off.: 45/3, Industrial Area, Site IV,. Sahibabad, Ghaziabad, Uttar Pradesh – 2010120, Secretarial review was conducted in a manner that provide us a reasonable basis for evaluating the corporate conducts / statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, minutes books, forms and returns filed and other records maintained by the Listed Entity and also the information provided by the Listed Entity, its officers, agents and authorised representatives during the conduct of secretarial review, we hereby report that in our opinion, the listed entity has during the period under review covering financial year ended on 31-03-2025, complied with statutory provisions listed hereunder and also that the listed entity has proper board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made herein under: -

We, Vipin Shukla & Company, a firm of Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Advance Steel Tubes Limited ("the listed entity" or "Company"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

for the year ended March 31, 2025 ("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 (including amendments, modifications from time to time), 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; (***Not Applicable to the Company 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 Company during the review period***);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (***Not Applicable to the Company during the review period***);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (***Not Applicable to the Company during the review period***);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (***Not Applicable to the Company during the review period***);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1956 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

(j)Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client to the extent of Securities issued;

and circulars/guidelines issued thereunder;

and based on the above examination and considering the relaxation granted by Ministry of Corporate affairs and Securities and Exchange Board of India,

We 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:

S, 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
NONE										

(b)The listed entity has taken the following actions to comply with the observations made in previous reports:

S, 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
NONE										

Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):

S No.	Particulars	Compliance Status (Yes/	Observations / Remarks by PCS
-------	-------------	-------------------------	-------------------------------

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

		No/NA)	
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by The Institute of Company Secretaries India (ICSI), as notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2	Adoption and timely updation of the Policies: (i) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. (ii) All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	None
3	Maintenance and disclosures on Website: (i) The Listed entity is maintaining a functional website. (ii) Timely dissemination of the documents/ information under a separate section on the website. (iii) Web-links provided in Annual Corporate Governance Reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.	Yes	None
4	Disqualification of Director: None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5	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.	NA	No Subsidiary / No Material Subsidiary has been identified.
6	Preservation of Documents: 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 (Listing Obligations and Disclosure Requirements)	Yes	None

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

	Regulations, 2015.		
7	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	None
8	Related Party Transactions: (a)The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b)The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.	Yes NA	None Company has not entered into any such transactions having no approval
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations	Yes	None
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity and 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 except as provided under separate paragraph herein (*).	Yes	No such instances were observed during the period.
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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 SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019 in compliance with the provisions of the LODR Regulations by listed entities.	Yes	
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI	NA	No additional non-compliances were

VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

407, 4TH FLOOR, INDRAPRAKASH BUILDING,
BARAKHAMBA ROAD, NEW DELHI-110001
fcsvipinshukla1973@gmail.com, #9821296627
PAN:AZIPS8609J,

	regulation/circular/guidance note etc.		observed for the period under review.
--	--	--	---

Assumptions and Limitation of Scope & Review:

Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

FOR VIPIN SHUKLA & COMPANY

Vipin Shukla
Digitally signed
by Vipin Shukla
Date: 2025.05.05
11:42:46 +05'30'

(CS VIPIN SHUKLA)

FELLOW M.NO. 6798, COP: 18011

PEER REVIEW CERTIFICATE NO.: 5465/2024

FRN: S2017DE492200

UDIN: F006798G000266277

Dtd: 05-05-2025