



**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](http://www.advance-india.com), [www.advance.co.in](http://www.advance.co.in)  
E-mail : [info@advance.co.in](mailto:info@advance.co.in)

**May 30, 2024**

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

**Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2024**

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 2023-24.

This is for your information and record.

Thanking you,  
Yours Faithfully

**For Advance Steel Tubes Limited**

**(Deoki Nandan Agarwal)**  
**Managing Director**  
**DIN: 00586794**

**Encl: as above**

# VIPIN SHUKLA & COMPANY

COMPANY SECRETARIES

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

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## Annual Secretarial Compliance Report

### of Advance Steel Tubes Limited for the Financial Year ended 31-03-2024

**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 31-03-2024, 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,

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for the year ended March 31, 2024 ("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; (***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;

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(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;

<b>S No.</b>	<b>Particulars</b>	<b>Compliance Status (Yes/ No/NA )</b>	<b>Observations / Remarks by PCS</b>
1	<b>Secretarial Standards:</b> 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	<b>Adoption and timely updation of the Policies:</b> (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	<b>Maintenance and disclosures on Website:</b> (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	<b>Disqualification of Director:</b> 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	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> 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	<b>Preservation of Documents:</b>	Yes	None

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	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) Regulations, 2015.		
7	<b>Performance Evaluation:</b> 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	<b>Related Party Transactions:</b> (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	<b>Disclosure of events or information:</b> 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	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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	As per information gathered, the statutory auditors of the company i.e. M/s. Singhal Shubham and Co', Chartered Accountants, submitted their resignation w.e.f 27-03-2024 due to poor

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			<p>health conditions of auditor Mr. Shubham Singhal (Signing Partner), inadvertently noticing the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019 which states that, if the auditor has signed the limited review/ audit report for the first three quarters of a financial year, then the auditor shall, before such resignation, shall issue the limited review / audit report for the last quarter of such financial year as well as the audit report for such financial year and as such. When it was brought to the notice of Mr. Shubham Singhal of Partner of M/s. Singhal Shubham and Co., Chartered Accountants, subsequently, they withdrew their resignation vide their letter dated 15-05-2024 and submitted the auditor's medical fitness report, who have signed the limited review/ audit report for the first three quarters of the</p>
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			financial year 2023-24.
13	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	No additional non-compliances were observed for the period under review.

(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										

## FOR VIPIN SHUKLA & COMPANY

**(CS VIPIN SHUKLA)**  
**FELLOW M.NO. 6798, COP: 18011**  
**PEER REVIEW CERTIFICATE NO.: 5465/2024**  
**FRN: S2017DE492200**  
**UDIN: F006798F000495649**  
**Dtd: 30/05/2024**