

Date: 30.06.2021

BSE Limited
Phirozejeejeebhoy Towers
Dalal Street
Mumbai-400 001

Sub: Sub: Submission of Annual Secretarial Compliance Report for the year ended 31stMarch, 2021.

Dear Sir(s)

Pursuant to Regulation 24A of SEBI (LODR) Regulation, 2015 and SEBI Circular No. CIR/CFD/CMD1 /27/2019 dated 8th February, 2019, we are herewith submitting the Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Kindly take the above on records.
Thanking you,

Yours faithfully,

For Mideast Integrated Steels Ltd.



Priyanka Chugh
Company Secretary and Compliance Officer

CC :

Listing Department
The Calcutta Stock Exchange Limited,
7, Lyons Range,
Kolkata-700001

MIDEAST INTEGRATED STEELS LIMITED

Corporate Identity No. - L74899DL1992PLC050216

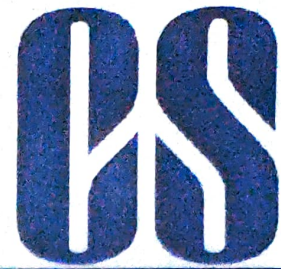
Regd. Off.: Mesco Towers, H-1, Zamrudpur, Community Centre, Kailash Colony, New Delhi - 110 048, India, T: 011-29241099, 40587085, 40587083
Bhubaneswar Office: Mesco Tower 3915, Lewis Road, Kedargouri Square, Bhubaneswar - 751 014, Odisha, T: 0674-2432755/59, Fax: 0674-2432256
Plant: Kalinga Nagar Industrial Complex, Khurunti, P. O. - Danagadi - 755 026, Dist. Jajpur Odisha, T: 06726-266042/45, 0671-2383100, Fax: 06726-266041
Mumbai Office: Unit No. 401, Silver Pearl Bldg. Water Field Road, Bandra (W), Mumbai - 400 050, T: 022-26603173/75/74
Kolkata Office: 14th Floor, Room No. 1412, 16, Strand Road, Kolkata - 700 001, T: 033-66451214 / 1215
E: info@mescosteel.com, **W:** www.mescosteel.com

Tripti Shakya & Company

Company Secretary in Practice

Address:- G 2 Plot No. 316 Sector 4 Ghaziabad, Uttar Pradesh
201010

Contact No. 91-8178515005 | Email: triptishakyacs2017@gmail.com



SECRETARIAL COMPLIANCE REPORT

OF

MIDEAST INTEGRATED STEELS LIMITED for the year ended 31.03.2021

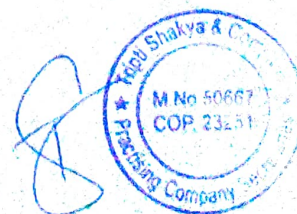
[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

We, M/s. Tripti Shakya & Co., Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by **Mideast Integrated Steels Limited** ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) other document(s)/ filing(s), as may be relevant, which has been relied upon to make this certification, for the year ended 31st March 2021 ("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, (wherever applicable), 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 Applicable during the year under review**
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **_Not Applicable during the year under review**
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **_Not Applicable 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 during the year under review;**
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

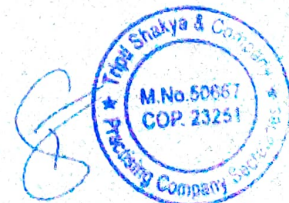


and circulars/ guidelines issued thereunder;

and based on the above examination, I/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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Filing of report under Reg. 13(3) of SEBI (LODR) Reg. 2015	For June 30, 2020 December 31, 2020	Company has done late filing for the Quarter ended 30.06.2020 and 30.12.2020
2.	Filing of Shareholding Pattern under Reg. 31 of SEBI (LODR) Reg. 2015.	For June 30, 2020 and December 31, 2020	Company has done late filing for the Quarter ended 30.06.2020 and 30.12.2020
3.	Filing of financial Results under Reg. 33 of SEBI (LODR) Reg. 2015	For March 2020, June 30, 2020, September 2020 and December 31, 2020	Company has done late filing of Financial Results for quarters ended March 2020, June 2020, September 2020 and December 2020.
4.	Composition of Board of Directors under Reg. 17 of SEBI (LODR) Reg., 2015		At the end of financial year the composition of the Board was not as per Regulation 17, as there requirement of One Independent Director.
5.	Composition of Nomination and Remuneration Committee under Reg. 19 of SEBI (LODR) Reg., 2015		At the end of financial year the composition of Nomination and Remuneration Committee was not as per Reg. 19, as there was a requirement of one more Independent Director.
6.	Filing of information under Reg. 74(5) of SEBI (D&P) Regulations, 2015		Company has done late filing for quarter ended December 2020.
7.	Filing of Rec. of Share Capital Audit Report under Reg. 76 of SEBI (DP) Reg. 2018		Company has done late filing for quarter ended December 2020.
8.	In terms of Securities and Exchange Board of India Circular No. Cir/ISD/3/2011, the 100 percent promoter's holding is to be in dematerialized form.		Promoter's holding is not in 100% Demat form.



9.	Non Publication as per Reg. 47 of SEBI (LODR) Reg., 2015		The Notice of Board Meeting was not Published for the Board Meeting held on 12.01.2021.
10.	In terms of Securities and Exchange Board of India Circular No. Cir/ISD/3/2011, the 100 percent promoter's holding is to be in dematerialized form.	As per Company's Records only 63.74 % Promoters holdings are in demat.	Promoter's holding is not in 100% Demat form.

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 our examination of those records.

The following are the details of action 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 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	BSE	Regulation 34 of SEBI (LODR) provisions for delay in submission of Annual Report	Fine was charged	Company had submitted the Annual Report of the Company by a delay. The Company had made payment of the fine.
2	BSE	Regulation 33 of SEBI (LODR) provisions for delay in submission of Financial Results for March 2020, June 2020 September 2020 and December 2020.	Fine was charged	The Company had submitted a clarification letter with BSE. No response was received upto 31.03.2021.
3	BSE	Regulation 13(3) of SEBI (LODR) provisions for delay in submission of statement of investor complaint for June 2020 December 2020.	Fine was Charged	The Company had submitted the statement of investor complaint by a delay. The Company had made payment of the fine for June 2020.



4	BSE	Regulation 31 of SEBI (LODR) for filing of Shareholding Pattern for June 2020 and December 2020.	Fine Charged	was	The Company had submitted the shareholding pattern by delay. The Company had made payment of the fine for June 2020.
4	BSE	Regulation 17(1), 17(2) of SEBI (LODR) Reg. 2015.	Fine Charged	was	Due to non approval of reappointment of Mr. Gurjeet Singh Jawandha in the AGM of Company, composition of the Board was not as per Regulation 17, as there requirement of One Independent Director.
5.	BSE	Regulation 19 of SEBI (LODR) Reg. 2015.	Fine Charged	was	Due to non approval of reappointment of Mr. Gurjeet Singh Jawandha in the AGM of Company, the composition of Nomination and Remuneration Committee was not as per Reg. 19, as there was a requirement of one more Independent Director. The Company is

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 31.03.2020	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by listed entity.
1	In terms of Securities and Exchange Board of India Circular No. Cir/ISD/3/2011, the 100 percent promoter's holding is to be in dematerialized form.	As per Company's Records only 34.45 % Promoters holdings are in demat.	The promoters has dematted some shares and now the dematted shares are 63.74%. Company is in receipt of declaration from promoters that the shares which are not in demat form are pending adjudication of dispute before judicial/ quasi-judicial authorities and same would be dematted once the dispute is	The matter is pending to be resolved.



			resolved/settled	
--	--	--	------------------	--

- e. In terms of SEBI Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019 SEBI had inter alia required the listed entity to amend the terms of appointment of its statutory auditors in terms of Clauses 6(A) and 6(B) of the said Circular. In this regard I report that there was no event of appointment/ re-appointment/ resignation of statutory auditor of the listed entity during the Review Period and the listed entity has modified the terms of appointment of its existing statutory auditor by including in their terms of appointment the conditions mentioned in Clauses 6(A) and 6(B) of the said Circular.

For Tripti Shakya & Co.
Practicing Company Secretaries



Tripti Shakya
(Proprietor)

ACS: 50667, C.P. No. 23251

UDIN: A050667C000539265

Place: Vaishali
Date: 29.06.2021