

P S CHANNE & ASSOCIATES
COMPANY SECRETARIES

SECRETARIAL COMPLIANCE REPORT

Name of Company: Mipco Seamless Rings Gujrat Limited

CIN: L72900KA1980PLC080581

For the Financial Year ended on 31st March 2023

I Pradip Sudhakar Channe, Practicing Company Secretary, have examined

1. All the documents and records (soft /electronic Copies) made available to me and explanations given by Mipco Seamless Rings Gujrat Limited (The Listed entity)
2. The filings /submissions made by the Listed entity to the Stock Exchange(s)
3. Website of the Listed Entity
4. Other documents/filing, as are relevant, which has been made relied upon to make this certification ,

For the financial year ended on 31st March 2023 ("Relevant Period") in respect of the compliance of the provisions of:

- a) The Securities and Exchange Board of India Act, 1992 (SEBI Act) and regulations, circulars, guidelines issued thereunder: and
- b) The Securities Contracts (Regulation) Act, 1956 (SCRA), Rules made thereunder and 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. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
2. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
3. The 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 DURNG THE RELEVANT PERIOD**
5. The Securities and Exchange Board of India (Share Based Employee Benefit) Regulations, 2014 – **NOT APPLICABLE DURNG THE RELEVANT PERIOD**
6. The Securities and Exchange Board of India (Issue and Listing of Debts Securities) Regulations, 2008 **–NOT APPLICABLE DURNG THE RELEVANT PERIOD**
7. The Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013 **–NOT APPLICABLE DURNG THE RELEVANT PERIOD**
8. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Based on the above examination, I hereby report that, during the Relevant 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:



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Sr. No.	Compliance Requirement (Regulations, Circulars, Guidelines including specific clause)	Deviation	Observation/Remarks of the Practicing Company Secretary
		No deviation	

- b) The Listed entity has maintained the proper books records under the provisions of the above regulations and Circulars/Guidelines issued thereunder in so far as it appears from my virtual examination of those records
- c) The following are details of action taken against the listed entity /its promoters/directors/ material subsidiaries either by SEBI or by Stock Exchange(s) (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 violations	Details of action taken i.e. fine, warning letter, debarment etc.	Observation/Remarks of the Practicing Company Secretary
				Company has not paid listing fees for last three years. Company Secretary not appointed after resignation of previous CS.

- d) The Listed entity has taken the following actions to comply with the observations made in previous report

Sr. No.	Observation/Remarks of the Practicing Company Secretary in the previous report	Observations made in the Secretarial Compliance Report for the financial year ended on 31 st March 2022	Action taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on actions taken by Listed Entity
1	Defaulting companies for non-payment of Annual listing fees of BSE	Yes	Entity is under the process of making the payment	Entity still not paid the dues for previous three years.

The Company Secretary of the Company has resigned and Mr. Sanjiv Kumar Tondon (DIN-02579261) has been designated as Compliance officer. Appointment of Independent Director in the AGM is void as No DIN number has obtained before the date of Appointment.

Place: Nagpur
Date: 08/05/2023

For P. S. Channe & Associates
Company Secretaries

P. S. Channe



Pradip S. Channe
M. No. 6265/C.P. No. 7138

UDIN number F006265E000268307