

UDIN: F009000B000376565

Annual Secretarial Compliance Report

[Pursuant to Reg. 24A of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

of

Creative Castings Limited

for the year ended 31st March, 2020

To,
The Board of Directors,
Creative Castings Limited
102, G.I.D.C. Phase-II
Rajkot Road
Dolatpara, Junagadh.

I, undersigned, being proprietor of M/s. M. Buha & Co., have examined:

- (a) all the documents and records made available to me and explanation provided by Director(s)/Officer(s) of the Creative Castings Limited ("**the listed entity**" or "**the 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,

for the year ended on 31st March, 2020 ("**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 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 review period**)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**not applicable to the Company during review period**)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**not applicable to the Company during review period**)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**not applicable to the Company during review period**)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 (in relation to the Companies Act and dealing with client);
- (j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (not applicable to the Company during review period); and
- (k) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (in relation to compliance with Rights & Obligations of Issuer under Chapter VII)
- and circulars/ guidelines issued thereunder; and 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.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar 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 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.
Nil*				

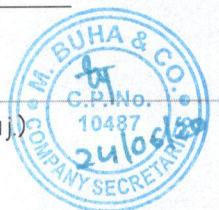
* BSE Ltd. had imposed fine of ₹ 7,54,020.00 (vide letter dated July 31, 2019) on the Company subsequently it was reduced to ₹ 5,36,900.00 (vide letter dated August 19, 2019) for non-compliance of certain corporate governance norms as against the same the company had justified their innocence in writing vide their letters dated August 6, 2019 & August 26, 2019, then after, nothing received by the Company towards payment of said fine.

- (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 on	Actions taken by the listed entity, if any.	Comments of the Practicing Company Secretary on the actions taken by the Listed entity
1	The Company has not published,	31 st March, 2019	The Company has started causing	Whatsoever observations made in my



	during the FY 2018-19, notice of meeting of the board of directors where financial results shall be discussed in English and Regional language newspapers.		newspaper publication during the FY 2019-20.	previous report are being complied with / rectified by the Company so long as it is concerning to the review period.
2	The Company has yet to appoint designated Depository to monitor foreign Investment Limits.	31 st March, 2019	Management are in view of that the Company do not have any foreign Direct Investment, thus, no need to monitor any foreign Investment and no need to appoint designated Depository for monitoring foreign investment limits of the Company.	-do-
3	The Company had apprised by way of Notes to the Notice calling 33 rd AGM to all shareholders that the transfer request for shares held in physical form will not be proceeds in physical form after December 5, 2018 and requested them to dematerialised their	31 st March, 2019	The Company has made default good during the FY 2019-20.	-do-



	shareholding, if not done so, but, not issued separate letter as envisaged in the Circulars.		
4	The Company while appointing Independent Directors on the Board in the FY 2018-19 and while disclosing fact of the same to BSE Ltd. at Corporate Announcement section; it has not specifically affirm as per the given circular.	31 st March, 2019	No any action -do- required thereon.

For, M. BUHA & CO.
Company Secretaries



Mayur Buha
24/06/20
Mayur Buha
proprietor

FCS No. 9000, C. P. No. 10487
Vadodara, 24th June, 2020

Disclaimer:

This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in my report which have been complied by the Company during the review period. I am not commenting on the Statutory Compliances whose due dates are extended or exemption granted by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.