

UDIN: F009000D000414449

**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 31<sup>st</sup> March, 2022

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., Company Secretaries, 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 31<sup>st</sup> March, 2022 ("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, includes: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (not applicable as there was no reportable event 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 as there was no reportable event during review period)

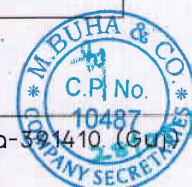


- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(not applicable as there was no reportable event during review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (repealed on 16<sup>th</sup> August, 2021); **(not applicable as there was no reportable event during review period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (repealed on 16<sup>th</sup> August, 2021); **(not applicable as there was no reportable event during review period)**
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (enforced on 16<sup>th</sup> August, 2021); **(not applicable as there was no reportable event during review period)**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) 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)**;
- (k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (repealed on 10<sup>th</sup> June, 2021) and Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (enforced on 10<sup>th</sup> June, 2021) **(not applicable as there was no reportable event during review period)**; and
- (l) 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 except in respect of matters specified below :-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 34(3) read with Para B of Schedule V to LODR Regulations.	Management Discussion and Analysis Report shall contain the matters as prescribed in Para B of Schedule V to LODR Regulations in Annual Report.	Management Discussion and Analysis Report attached to the Annual Report for the FY 2020-21 do not contain "Operating Profit Margin" ratio.



- (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 ₹ 2,71,400.00 (inclusive of 18% GST), vide e-mail dated January 14, 2022, on the Company for Non-compliance with disclosure of related party transactions on consolidated basis as envisaged under Regulation 23(9) of LODR Regulations. Later on, on January 31, 2022, said fine was calculated to ₹ 3,71,700.00 (inclusive of 18% GST), as against the aforesaid, the company had clarified that it has complied with stated regulation in due time and supplied supporting proof along with its reply to aforesaid e-mail, subsequently, nothing received by the Company from BSE Ltd. 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	Delay in submission (by more than 30 minutes from conclusion of Board Meeting) of Outcome of Board Meetings held on 22 <sup>nd</sup> August, 2020 (1 <sup>st</sup> quarter of FY 2020-21), 29 <sup>th</sup> October, 2020 (2 <sup>nd</sup> quarter of FY 2020-21) and	31 <sup>st</sup> March, 2021	No action taken but Company has ensured timely disclosure without causing any delay in their submissions throughout the financial year 2021-22.	Whatever observations made in my previous report are being complied with / rectified by the Company so long as it is concerning to the review period.



9<sup>th</sup> February,  
2021 (3<sup>rd</sup> quarter  
of FY 2020-21)  
for adoption of  
quarterly  
financial results  
and Board  
Meetings held on  
25<sup>th</sup> July, 2020  
for  
recommendation  
of final Dividend.

2	The Company has made violation of regulation 36(5) of LODR Regulations by not disclosing information as envisaged therein for appointment of auditor in 35 <sup>th</sup> AGM of the Company.	31 <sup>st</sup> March, 2021	No action taken	The Company can't rectify the event which has been occurred in past and duly circulated and approved by its members.
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- (e) The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For, M. BUHA & CO.  
Company Secretaries



Mayur Buha  
proprietor

FCS No. 9000, C. P. No. 10487  
Junagadh, 28/05/2022

**Disclaimer:**

This Report is limited to the Statutory Compliances on laws / regulations / guidelines etc. enlisted in this report which have been complied by the Company during the review period. Those due dates were extended by Regulators from time to time due to COVID-19 pandemic and the Company has made compliances within the extended period are considered as compliance in this report. I am not commenting on the Statutory Compliances whose due dates are extended or exemption granted by Regulators due to COVID-19 or still there is time to comply with such compliances.