



SHIV AUM STEELS LIMITED

August 14, 2025

To,  
The Manager,  
Listing Department,  
The National Stock Exchange of India Ltd,  
'Exchange Plaza', C-1 Block 'G',  
Bandra Kurla Complex, Bandra (E),  
Mumbai -400051

**Ref: Symbol – SHIVAUM**

Dear Sir,

**Sub: Compliance under Regulation 24(A) of the Securities and Exchange Board of India  
(Listing Obligations and Disclosure Requirements) Regulations, 2015.**

In terms of Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby enclose Annual Secretarial Compliance Report duly issued by **Mayuri Rupareliya & Associates**, Practicing Company Secretary, for the financial year ended March 31, 2025.

Please take the same on record.

Thanking you,  
Yours faithfully,

**For SHIV AUM STEELS LIMITED,**

**SANJAY N BANSAL  
WHOLE-TIME DIRECTOR  
DIN: 00235509**

GSTIN: 27AAFCS9987G1ZL

CIN NO: L27105MH2002PLC135117

Regd. & Admin Office: 515, The Summit Business Bay, Near  
WEH Metro Station, A.K. Road, Andheri (E.), Mumbai-400 093

Tel : 022-26827900/01/02/03/04  
Fax: 022-26827899

E-info@shivaumsteels.com  
www.shivaumsteels.com



**M. Rupareliya & Associates**  
**Practising Company Secretary**

To,  
The Members  
**Shivaum Steels Limited**  
515, The Summit Business Bay, Opp.  
Cinemax Western Express Way, A.K. Road  
Andheri (East), Mumbai, Maharashtra, India, 400093

**Subject: Annual Secretarial Compliance Report for the Financial Year 2024-25**

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **M/s Shivaum Steels Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at 515, The Summit Business Bay, Opp. Cinemax Western Express Way, A.K. Road Andheri (East), Mumbai, Maharashtra, India, 400093, India. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

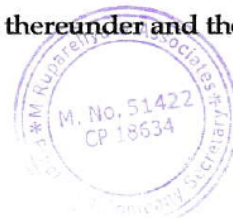
Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the 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 hereinafter:

I Mayuri Rupareliya, Practising Company Secretary (PCS) have examined:

- all the documents and records made available to us and explanation provided by of **Shivaum Steels Limited** ("the listed entity"),
- the filings/ submissions made by the listed entity to the Stock Exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this Report.

for the financial year ended 31<sup>st</sup> March, 2025 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the SEBI;





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**Practising Company Secretary**

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(No Compliances were required to be made during the review period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(No Compliances were required to be made during the review period)**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable to the Company**
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **Not Applicable to the Company**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- other regulations as applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period

I. (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)	Regulations/circular No.	Deviations	Action Taken by	Type of Action
(a)	(b)	(c)	(d)	(e)	(f)
Not Applicable					

Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
		(i)		







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**Practising Company Secretary**

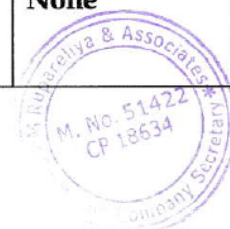
(g)	(h)	(i)	(k)
Not Applicable			

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations/ Remarks of the Practising Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended FY 2023-24	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)
(a)	(b)	(c)	(d)
Not Applicable			

II. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
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 of India (ICSI).	Yes	None
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/ circulars/ guidelines issued by SEBI.</li></ul>	Yes	None
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The listed entity is maintaining a functional</li></ul>	Yes	None





	<p>website.</p> <ul style="list-style-type: none"><li>• Timely dissemination of the documents/ information under a separate section on the website.</li><li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.</li></ul>		
4.	<p><b>Disqualification of Director(s):</b></p> <p>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	The listed entity has provided the Required confirmation on the same.
5.	<p><b>Details related to subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.</p>	Yes	The listed entity has one subsidiary- Shivom Ventures Private Limited
6.	<p><b>Preservation of Documents:</b></p> <p>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 LODR Regulations, 2015.</p>	Yes	None
7.	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/ during the financial year as prescribed in SEBI Regulations.</p>	Yes	None
8.	<p><b>Related Party Transactions:</b></p> <p>(a) The listed entity has obtained prior approval of audit committee for all related party transactions;</p> <p>(b) In case no prior approval obtained, the listed</p>	<p>Yes</p> <p>N.A.</p>	<p>None</p> <p>No such</p>





	entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.		transactions done without prior approval of Audit committee
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 LODR Regulations, 2015 within the time limits prescribed thereunder.	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/ 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 (or)  The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the above column I (a).	NA	
12	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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 section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed	N.A.	





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**Practising Company Secretary**

	entities.		
13.	<b>Additional non-compliances, if any:</b>  No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	No	

**Assumptions & Limitation of scope and review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

**For M Rupareliya & Associates**  
**Practicing Company Secretaries**



**CS Mayuri Rupareliya**  
**Peer Review No.2017/2022**  
**ACS-A51422**  
**COP-18634**  
**UDIN: A051422G000589839**

**Date: June 12, 2025**  
**Place: Rajkot**