

30.05.2025

To,

NATIONAL STOCK EXCHANGE OF INDIA LIMITED

Exchange Plaza, Plot No C/1, G-Block,
Bandra – Kurla Complex, Bandra (E),
Mumbai – 400051

NSE Symbol: SALSTEEL

BSE LIMITED

Phiroze Jeejeebhoy Tower,
Dalal Street,
Mumbai – 400001

BSE Scrip Code: 532604

Sub.: Board Comments on Fine levied by Stock Exchanges

Ref: Notice issued by NSE having ref. NSE/LIST-SOP/COMB/FINES/0573 dated 20/05/2025

Ref: Email Received From BSE having Ref. SOP-CReview/December 2024-Q dated 20/05/2025

This is to inform you that the Board of Directors was apprised of above mentioned notices dated 20/05/2025 received from both Stock Exchanges for Non-Compliance under Regulation 6 (1) of SEBI (LODR) Regulations, 2015 for non- appointment of a qualified Company Secretary and Compliance officer within the prescribed time. The Board acknowledges the Stock Exchanges' Observations regarding delay in this compliances and fully appreciate the importance of strict adherence to regulatory deadlines.

The Board wishes to clarify that The Company needs to appoint Company Secretary to comply with regulation 6 of SEBI (LODR) Regulations, 2015. The company was unable to recruit Company secretary and Compliance officer, Because of So many Public issues, there is acute shortage of Company Secretary. And as the Corporate office of Secretarial Department of the company is located in Industrial area and very far from City Corporate area, Many CS are reluctant to join Company even though the Company was in continuous process of recruiting Company Secretary.

However, the Board of Directors of the company at their meeting held on March 18, 2025 have approved the appointment of Mrs. Radhika P. Soni (Membership No. A64410) as Company Secretary and Compliance officer of the Company pursuant to the provisions of section 203 of the Companies Act, 2013 and regulation 6(1) of Listing Regulations with effect from March 18, 2025 as soon as the company has finalized the suitable candidates for the position of Company Secretary and Compliance Officer.

Necessary Disclosure under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD/4/2015 dated September 09, 2015 is given to Stock Exchanges in outcome of Board meeting held on today i.e. March 18, 2025.

The Board is committed to ensuring that such oversight do not recur. To this end, we are strengthening our internal compliance processes and remain dedicated to upholding the highest standards of Corporate Governance and transparency. The Board is taking steps to ensure that all

CIN – L 29199GJ2003PLC043148

future regulatory compliances are met promptly, safeguarding the interests of investors and avoiding any penalties. Notices and e-mails as mentioned above are being attached herewith as **ANNEXURE A.**

Thanking you. Yours faithfully,
For SAL Steel Limited

BABUALAL SINGHAL

Whole Time Director

DIN.: 01484213

Encl: as above

NSE/LIST-SOP/COMB/FINES/0573

May 20, 2025

To,
The Company Secretary
S.A.L. Steel Limited
5/1, Shreeji House, 5th Floor,
Behind M.J. Library Ashram Road,
Ahmedabad, Gujarat- 380006

Dear Sir/Madam,

Subject: Notice for non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and/or Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 (“Depository Regulations”)

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as “Master Circular”), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations and/or Depository Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with certain regulations of Listing Regulation(s). The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with respective regulation(s) and/or make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate following actions as per Master Circular:

1. Initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.
2. Trading in securities of your Company shall take place on 'Trade for Trade' basis, in case of consecutive defaults with Regulation 76 of Depository Regulations i.e., Shifting of trading in securities to Z Category as per Master Circular.

You may also file the waiver request. Below are the parameters for filing the application for waiver:

- a) Detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.
- b) The Company may further note that ***compliance is a prerequisite for applying for waiver***. Thus, waiver application of the non-complied Companies will not be processed without achieving the compliance.
- c) In case the Company is non-complaint under multiple regulations, the Company is advised to file a single application mentioning the details of all the respective regulations and quarters for which the Company intends to apply for waiver, in order to avoid the duplication of the entries.

National Stock Exchange Of India Limited

- d) Processing fees for an amount of **Rs.10,000 plus 18% GST** to be paid to the **designated Exchange**, (as segregated between the Exchanges as per the policy for waiver of fines) only if the fine amount is more than Rs. 5,000.

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

- i. **Policy on exemption of fine:**
https://archives.nseindia.com/content/equities/Policy_for_exemption_SOP_Equity.pdf
- ii. **Policy on processing of waiver application:**
https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link (Please note that waiver applications sent via mail will not be considered):

NEAPS>>Compliance>>Fine Waiver>>Waiver Request

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

Path: NEAPS > COMPLIANCE > Announcements > Announcements/ CA (Subject: Updates)

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department:

- Ms. Harshita Chaubal
- Ms. Suman Lahoti
- Ms. Madhu Kadam
- Ms. Chanchal Daga (Waiver request)
- Ms. Sweety Mamodia (Waiver request)
- Mr. Abhishek Sawant (Waiver request)

Yours faithfully
For **National Stock Exchange of India Limited**

Rachna Jha
Manager

This Document is Digitally Signed



Signer: RACHNA JHA
Date: Tue, May 20, 2025 18:46:56 IST
Location: NSE

Annexure

Regulation	Quarter	Fine amount per day (Rs.)	Days of non-compliance	Fine amount (Rs.)
6	31-Mar-2025	1000	76	76000
Total Fine				76000
(GST @18%)				13680
Total				89680*

* In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date of compliance.

Notes:

- **If the fine amount is paid before receipt of this letter then inform the Exchange accordingly.**
- Please update the payment details on below mentioned path:
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as mentioned above will be credited to IPFT as envisaged in the circular.

This Document is Digitally Signed



Signer: RACHNA JHA
Date: Tue, May 20, 2025 18:46:56 IST
Location: NSE

Narayan Shah

From: bse.soplodr <bse.soplodr@bseindia.com>
Sent: Tuesday, 20 May, 2025 05:14 PM
To: sal.investor@salsteel.co.in; niraj.jain@salsteel.co.in; sal.investor@salsteel.co.in;
sal.investor@salsteel.co.in
Cc: bse.soplodr
Subject: 532604-Fines as per SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (Chapter-VII(A)-Penal Actions for Non-Compliance).

Ref.: SOP-CReview/ March 2025-Q/20-05-2025

To
The Company Secretary/Compliance Officer
Company Name: S.A.L. Steel Ltd
Scrip Code: 532604

Dear Sir/Madam,

Sub: Fines as per SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (Chapter-VII(A)-Penal Actions for Non-Compliance).

The company is advised to refer to the SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

https://www.bseindia.com/downloads1/Guidance_Note_for_SEBI_SOP_Circular.pdf

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed	Fines levied till the	Compliance status	Fine payable by the company (inclusive of GST @ 18 %) as on May 20,2025		
				Basic Fine	GST @ 18 %	Total Fine payable
Regulation 76 of SEBI (Depositories & Participants) Regulation 2018 Non-submission of Reconciliation of share Capital audit Report.	NA	quarter ended March 2025	-	NA		
Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary	Rs. 1,000 per day	quarter ended March 2025	Non-Complied	76000	13680	89680

as the compliance officer						
Regulation 7(1) Non-compliance with requirement to appoint share transfer agent	Rs. 1,000 per day	quarter ended March 2025	-	0	0	0
Regulation 13(3) Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Rs. 1,000/- per day	quarter ended March 2025	-	0	0	0
			Total	76000	13680	89680

As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter.** The company is advised to bring the provisions of this Circular to the notice of the promoter of the company. In this regard, it may also be noted that details of outstanding fines payable pursuant to SEBI SOP Circulars for the prior period, if any, will be provided separately. The SEBI circular stipulates that the freeze on promoter demat accounts should be lifted only after the company complies and pays all the outstanding fines.
- Further in the event of this being the second consecutive quarter of non-compliance for the Regulation 76 would result in the company being transferred to Z group and liable for suspension of trading of its equity shares.
- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

(For assistance in login on listing center the company can contact helpdesk on Tel. No. 022-61363155 or email id: listing.centre@bseindia.com and for XBRL related queries company may contact on helpline no: 9316749660 or send emails to bse.xbrl@bseindia.com).

Yours faithfully

Sambhaji Solat
Senior Manager
Listing Compliance

Reena Raphel
Associate Manager
Listing Compliance

Company is requested to remit the fine amount through electronic transfer to the designated bank - details given below:

Company Name	S.A.L. Steel Ltd		
Account Name	Branch Name & Branch	Account No.	IFSC Code
BSE Limited	ICICI Bank Ltd.- CMS Branch	BSER09208	ICIC0000104

or through cheque favoring **BSE Ltd.** The company is required to submit the cheque alongwith the covering letter (format given at Annexure I below):

Annexure-I (On letterhead of the company)

Listing Compliance, BSE Limited, Ground Floor,
P. J. Towers, Fort, Mumbai-400001.

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

Scrip Code	Regulation & Quarter	Amount paid	TDS deducted, if any	Net Amount paid	GST No. (Mandatory to upload on BSE Listing Centre) (*)

**(In case GSTin No of company is not uploaded on the Listing Centre or Declaration for Unregistered Dealer is not received by us, company can not claim any GST input credit for the invoices raised by us.)*

Remitted by:

Cheque/DD No.	Date	UTR No. for RTGS /NEFT

Compliance Officer / Company Secretary.

- Please mention the Regulation No., Quarter, and amount of TDS deducted on the reverse side of the Cheque/Demand Draft.
- In case of payment through RTGS/NEFT, you are requested to send a soft copy of this annexure to bse.soplodr@bseindia.com

- **Contact detail for any queries regarding compliance of specific regulation /clarifications as under:**

Regulation	Officer Name	Email Id
Reg. 6, 7 & 76	Ms. Arpeeta Pawaskar	Arpeeta.Pawaskar@bseindia.com bse.soplodr@bseindia.com
Reg.13(3)	Mr. Krishna Rathi	Krishna.Rathi@bseindia.com bse.soplodr@bseindia.com

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