

UDIN: F009000C000451068

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, 2021

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:

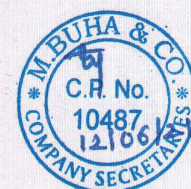
- (a) all the documents and records made available to me and explanation provided by Director(s)/Officer(s) of the Creative Castings Limited ("the listed entity" or "the Company"),
- (b) the filings / submissions made by the listed entity to the stock exchange,
- (c) website of the listed entity,
- (d) any other document / filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2021 ("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 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; (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; (not applicable as there was no reportable event 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 as there was no reportable event 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 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	Reg. 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) ("LODR Regulations") read with Clause 4 of Para A of Part A of Schedule III to LODR Regulations	Delay in submission (by more than 30 minutes from conclusion of Board Meeting) of Outcome of Board Meetings held on 22 nd August, 2020 (1 st quarter of FY 2020-21), 29 th October, 2020 (2 nd quarter of FY 2020-21) and 9 th February, 2021 (3 rd quarter of FY 2020-21) for adoption of quarterly financial results and Board Meetings held on 25 th July, 2020 for recommendation of final Dividend.	<p>BM date: 22-08-2020 BSE Received Time: 05:43:43 PM BM conclusion time: 05:00:00 PM Delay time: 00:13:43</p> <p>-----</p> <p>BM date: 29-10-2020 BSE Received Time: 01:42:25 PM BM conclusion time: 12:40:00 PM Delay time: 00:32:25</p> <p>-----</p> <p>BM date: 09-02-2021 BSE Received Time: 01:24:36 PM BM conclusion time: 12:50:00 PM Delay time: 00:04:36</p> <p>-----</p> <p>BM date: 25-07-2020 BSE Received Time: 02:17:59 PM BM conclusion time: 01:25:00 PM Delay time: 00:22:59</p>



2	Reg. 36(5) of LODR Regulations	Disclosures as depicted in said regulation with regards to the appointment of auditor are not disclosed either in resolution or explanatory statement forming part of the notice calling 35 th AGM of the Company.	The Company has made violation of regulation 36(5) of LODR Regulations by not disclosing information as envisaged therein.
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- (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) There were no 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 insofar as it appears from my examination of those records.
- (d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.
- (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, 12th June, 2021

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.