KANISHK STEEL INDUSTRIES LTD

Old No. 4, New No. 7, Thiru-Vi-Ka 3rd Street, Royapettah High Road,
Mylapore, Chennai - 4. Ph : (044) 4291 9700 Fax : (044) 4291 9719
CIN : L27109TN1995PLC067863
E-mail : sales@kanishksteels.in

ISO 9001

Date: 28 May 2026

To
BSE Limited
25th Floor, Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001

Dear Sir / Madam,

Ref: Scrip Code: 513456 | Scrip ID: KANSHST

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31 March 2026

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31 March 2026.

Kindly take the same on record.
Thanking you,

For KANISHK STEEL INDUSTRIES LIMITED

VISHAL KEYAL

Digitally signed by VISHAL KEYAL
Date: 2026.05.28 16:29:10 +05'30'

VISHAL KEYAL
Chairman and Managing Director
DIN: 00092651

Encl.: Annual Secretarial Compliance Report

M K MADHAVAN & ASSOCIATES
Company Secretaries

2C, 2nd Floor, A Block,
Prince Arcade, Cathedral Road,
Chennai - 600086.

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SECRETARIAL COMPLIANCE REPORT OF KANISHK STEEL INDUSTRIES LIMITED

FOR THE YEAR ENDED 31st MARCH 2026

[Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To

The Board of Directors

KANISHK STEEL INDUSTRIES LIMITED

We have been engaged by KANISHK STEEL INDUSTRIES LIMITED (hereinafter referred to as "the Company") bearing CIN: L27109TN1995PLC067863 whose equity shares are listed on BSE Limited, to conduct the Annual Secretarial Compliance Review in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with applicable SEBI Circulars issued thereunder.

We have examined:

(a) all the documents and records made available to us and explanation provided by KANISHK STEEL INDUSTRIES LIMITED ("the listed entity");

(b) the filings/ submissions made by the listed entity to the stock exchanges;

(c) website of the listed entity;

(d) any other document/ filing, as may be relevant, which has been relied upon to make this Report,

for the year ended March 31, 2026 ("Review Period") in respect of compliance with the provisions of:

1. Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
2. 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");

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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 ("LODR");

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – ***Not applicable, as the Company has not made any further issue of securities during the financial year under review;***

(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 the Company has not bought back/ proposed to buyback any of its securities during the financial year under review;***

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 – ***Not applicable as the Company has not granted any share-based employee benefits during the financial year under review;***

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 – ***Not applicable, as the Company has not issued or listed any non-convertible securities during the financial year under review;***

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and based on the above examination, we 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:

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Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice / Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary)	Management Response	Remarks
1.	Submission of Corporate Governance Compliance Report within the period prescribed under the Regulations.	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delay in submission	BSE Limited	Fine	Delay in submission of Corporate Governance Compliance Report for the quarter ended 31st March 2025.	₹33,040 (including GST)	BSE levied SOP fine for delayed submission of Corporate Governance Compliance Report.	The delay was subsequently regularised and the Company paid the fine levied by BSE.	Fine paid and matter closed.
2.	Submission of Statement of Investor Complaints within the period prescribed	Regulation 13 (3) of SEBI (LODR) Regulations, 2015	Delay in submission	BSE Limited	Fine	Delay in submission of Statement of Investor Complaints for the quarter	₹16,520 (including GST)	BSE levied SOP fine for delayed submission of Statement of Investor	The delay was subsequently regularised and the Company paid the	Fine paid and matter closed.

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	under the Regulations.					ended 31st March 2025.		Complaints .	fine levied by BSE.	

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

Sr. No	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2025	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Delay in submission of Annual Report.	The Annual Report for FY 2023-24 was uploaded under the General Corporate Announcement category instead of the prescribed Annual Report category, pursuant to which BSE levied SOP fine.	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	BSE levied SOP fine for delay in submission of Annual Report.	The Company submitted a waiver application to BSE. BSE approved the waiver request and waived the SOP fine of ₹82,600 levied in connection with the Annual Report filing.	Matter stands closed. No further action is pending.

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I. We 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.	**Secretarial Standards** 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	NIL
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	NIL NIL
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website. • Timely dissemination of the documents/ information under a separate section on the website. • 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.	Yes Yes Yes	NIL NIL NIL
4.	**Disqualification of Director:** None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL

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5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies	NA	The Company does not have any subsidiary company.
	(b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	NA
6.	**Preservation of Documents:** 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.	Yes	NIL
7.	**Performance Evaluation:** 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.	Yes	NIL
8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions	Yes	NIL
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee in case no prior approval has been obtained.	NA	Prior approval has been obtained.
9.	**Disclosure of events or information:** 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	NIL

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10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	NIL
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 last column	Yes	Refer observations reported in Part (a) above.
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** 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 entities	NA	There was no resignation of statutory auditors.
13.	**Additional Non-compliances, if any:** No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	NIL

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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	**Compliances with the following conditions while appointing/ re-appointing an auditor**		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	There was no resignation of statutory auditors.
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	There was no resignation of statutory auditors.
	iii. If the auditor has signed the limited review/ audit report for the first three quarters of a	NA	There was no resignation of statutory auditors.

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	financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.		
2.	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and	NA	There was no resignation of statutory auditors.

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		the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.		
		b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought	NA	There was no resignation of statutory auditors.

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	and not provided by the management, as applicable. c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor. **ii. Disclaimer in case of non-receipt of information:** The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not	NA NA	There was no resignation of statutory auditors. There was no resignation of statutory auditors.



	provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	There was no resignation of statutory auditors.

We further report that

(a) the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations are not applicable for this listed entity.

(b) The listed entity has complied with the requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

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 certify 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 (Listing Obligations and Disclosure Requirements) 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.

M.K. MADHAVAN & ASSOCIATES * Company Secretaries * CHENNAI

For **M K MADHAVAN & ASSOCIATES**

Company Secretaries





M K MADHAVAN

Proprietor

Membership No.: F-8408 / C.P. No.: 16796

P.R. No. 7654/2026

UDIN: F008408H000496821

Date: 27.05.2026

Place: Chennai