



SRU STEELS LIMITED

CIN:L17300DL1995PLC107286

Registered & Corporate Office : A-48, 1st Floor, Wazirpur Industrial Area, Delhi - 110 052

E-mail : srusteels@yahoo.in, Website : www.srusteels.in • Tel : 011-27474749

SRU/CS/2019-20/100

Date: April 29, 2019

The Manager,
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

Sub: Submission of Reconciliation of Share Capital Audit Report for Quarter ended 31st March, 2019.

Dear Sir,

With reference to the above captioned subject we do hereby submit the reconciliation of Share Capital Audit Report for the quarter and year ended 31st March, 2019 as per SEBI (Depository & Participants) Regulation, 1996 & Circular No. D&CC/FITTC/CIR-16/2002-December 31, 2002

Kindly take the same on records.

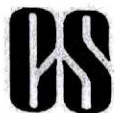
Thanking You,

For **SRU STEELS LIMITED**



Diksha Gandhi
Company Secretary

Encl: As above



Anand Kumar Singh

(Company Secretaries)

To,
The Board of Directors
SRU Steels Limited
A-48, 1st Floor, Wazirpur Industrial Area,
Delhi-110052

RECONCILIATION OF SHARE CAPITAL AUDIT REPORT

We have examined the relevant books, registers, forms, documents and papers produced before us by SRU Steels Limited ('the Company') and its Registrars and Transfer Agents, Beetal Financial & Computer Services (P) Ltd, in respect of Reconciliation of Share Capital Audit as per Regulation 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (erstwhile Regulation 55A of the SEBI (Depositories and participants) Regulation, 1996), and SEBI's circular No. D&CC/FITIC/CIR - 16/2002 dated December 31, 2002.

To the best of our knowledge and according to the information and explanations given to us and as shown by the records examined by us, we certify the following:

1.	For Quarter Ended	March 31, 2019
2.	ISIN	INE425C01017
3.	Face Value	Rs. 10/-
4.	Name of the Company	SRU Steels Limited
5.	Registered Office Address	A-48, 1 st Floor, Wazirpur Industrial Area, Delhi-110052
6.	Correspondence Address	A-48, 1 st Floor, Wazirpur Industrial Area, Delhi-110052
7.	Telephone & Fax No.	Tel. No-011-27373622 Fax No. 011-27373622
8.	E-mail Address	srusteels@yahoo.in
9.	Name of the Stock Exchange where the Company's securities are listed	BSE Limited





Anand Kumar Singh

(Company Secretaries)

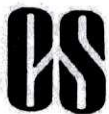
		No. of Shares	% of Total Issued Capital			
10.	Issued Capital	79,91,900	100%			
11.	Listed Capital (Exchange- wise) (As per Company records for all the Stock Exchanges)	36,27,400	45.39			
12.	Held in dematerialized form in CDSL	54,68,420	68.425			
13.	Held in dematerialized form in NSDL	1,40,080	1.753			
14.	Physical	23,83,400	29.823			
15.	Total No. of shares (12+13+14)	79,91,900	100.00			
16.	Reasons for difference if any, between (10&11), (10&15), (11&15)	Reasons for difference between (10&11), (10&15) and (11&15) is that, Trading Approval for 36,27,400 equity shares has been given and 43,64,500 equity shares has been kept in abeyance by SEBI. More details are given in Annexure-1.				
17.	Certifying the details of changes in share capital during the quarter under consideration as per Table below:					
Particulars**	No. of shares	Applied/ Not Applied for listing of shares	Listed on Stock Exchanges (Specify Names)	Whether intimated to CDSL	Whether intimated to NSDL	In- Prin. Appr. Pending for SE (Specify Names)
NA	NA	NA	NA	NA	NA	NA

** Rights, Bonus, Redeemable

** Rights, Bonus, Preferential Issue, ESOPs, Amalgamation, Conversion, Buyback, Capital Reduction, Forfeiture, Any Other (to specify).

18.	Register of Members is updated (Yes/No) If not, updated up to which date.	Yes
19.	Reference of previous quarter with regards to excess dematerialized shares, if any	Not Applicable
20.	Has the company resolved the matter mentioned in point no. 19 above in the current quarter? If not	Not Applicable



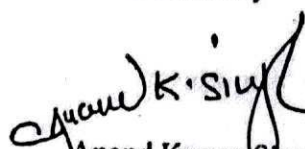


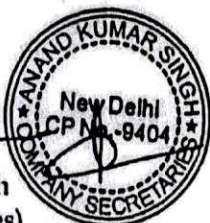
Anand Kumar Singh

(Company Secretaries)

21.	Mentioned the total no. of requests, if any, confirmed after 21 days and the total nos. of requests pending beyond 21 days with the reasons for delay :			
	Total No. of Demat Requests	No. of Requests	No. of Shares	Reasons for delay
	Confirming after 21 days	Nil	Nil	Nil
	Pending for more than 21 days	Nil	Nil	Nil
22.	Name, Telephone & Fax No. of the Compliance Officer of the Company.		Ms. Diksha Gandhi (Company Secretary & Compliance Officer) Ph. 011-27373622 Fax No. 011-27373622	
23.	Name, Address, Telephone & Fax no., Registration Number of Auditors		Mr. Anand Kumar Singh M. No. 24881 (Company Secretary in whole Time Practice) Address: 183B, Second Floor, Gurudwara Road, West Guru Angad Nagar, Laxmi Nagar, Delhi-110092 Mob. No. 98687822430/Tel- 01142730004	
24.	Appointment of Common Agency for share registry Work		Beetal Financial & Computer Services (P) Ltd., Beetal House, 3 rd Floor, 99, Madangir, Behind Local Shopping Centre, Near Dada, Harsukhdas Mandir, New Delhi -110062	
25.	Any other detail that the auditor may like to provide		As per <u>Annexure-1</u>	

Yours Sincerely


Anand Kumar Singh
(Company Secretaries)
M. No- 24881
COP No- 9404
Date: 29/04/2019
Place: Delhi





Anand Kumar Singh

(Company Secretaries)

Annexure-1

I would like to inform your good office that, SEBI vide its Letter No. DSC/DL/SK/IP/534/2017-18 dated October 27, 2018 has been granted In-principal approval for Listing of 79,91,900 equity shares, however trading approval was granted only for 36,27,400 equity shares and 43,64,500 equity shares were kept in abeyance.

Point No.12 of aforesaid In-Principal approval letter is reproduced below for your kind reference:

12. Listing Approval shall be granted to list entire paid up Equity Capital of the Company i.e. 79,91,900 equity shares however Trading Approval shall be granted only for the Pre-Merger equity shares i.e. 36,27,400 Equity Shares. Further, Trading Approval for 43,64,500 equity shares will be kept in abeyance till SEBI decides on the non-compliances in the matter of Scheme of Arrangement of the Company.

However, the SEBI vide its Letter No. DCS/DL/SR/TP/1191/2017-18 dated February 01, 2018, has been granted listing and Trading approval of 36,27,400 equity shares only.

Further, I would also like to inform you that the Company has approached to the BSE for its capital confirmation listed on BSE i.e. whether it should be as mentioned in the In-Principal approval or as it mentioned in Listing approval vide their email dated April 16, 2019, however as per the confirmation received from the management till date there is no communication received from your good office.

Yours Sincerely


Anand Kumar Singh
(Company Secretaries)



M. No- 24881
COP No- 9404

Date: 29/04/2019
Place: Delhi