



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/2021-22/243

Dated: October 09, 2021

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

Scrip Code: 540914

Sub: "Quarterly Compliance Report on Corporate Governance under Regulation 27 of the SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 for the Quarter and Half year ended 30th September, 2021.

Dear Sir/Madam,

In terms of Regulation 27 of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015, please find enclosed herewith the Quarterly Compliance Report on Corporate Governance for the Quarter and half year ended 30th September, 2021.

Kindly take the same on records,

Thanking You,

For SRU Steels Limited



Shallu Garg
Company Secretary & Compliance Officer
Investor Email id: srusteels@yahoo.in
Encl: As above

QUARTERLY COMPLIANCE REPORT ON CORPORATE GOVERNANCE

Name of the Company: - SRU Steels Limited
CIN No: L17300DL1995PLC107286
Quarter ended on: September 30, 2021

I. Composition of Board of Directors											
Title (Mr./ Ms.)	Name of the Director	PAN & DIN	Category/(Chairperson/Executive/ Non-Executive/Independent/Nominee)	Date of re-appointment or Initial Date of Appointment	Date of Birth	Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations]	Tenure*	Number of Directors hip in listed entities including this listed entity	No of Independent Directors hip in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations)	Number of Memberships in Audit/ Stakeholder Committee(s) including this listed entity	Number of post of Chairperson in Audit/ Stakeholder Committee(s) including this listed entity
Mr.	Apoorv Agarwal	02763242 & ALXPA4366K	MD (Executive)	11-02-2021	05-03-1991	N/A	----	01	00	01	00
Mr.	Rajeev Mittal	00082115 & AADPM9001G	Independent Director	30-09-2019	26-11-1966	N/A	7 Years	01	01	01	01
Mr.	Naresh Kumar Garg	00986846 & AAYPG1306K	Non-Executive Director	03/10/2006	26-01-1953	N/A	----	01	00	00	00

Mr.	Prem Prakash & Agarwal	00081871 AADPA0510E	Independent Director	30-09-2019	05-05- 1958	N/A	7 Years	01	01	02	00
Mr.	Pankaj Jain	01234804 & ADGPI4296A	Independent Director	30-09-2019	04-09- 1974	N/A	7 Years	01	01	02	01
Mr.	Ashok Kumar Mahawar	02600539 & ADRP4141J	Independent Director	30-09-2019	31-03- 1958	N/A	7 Years	01	01	00	00
Mrs.	Richa Agarwal	00082722 & AGFPA6980N	Non-Executive Director	23/06/2014	27-06- 1985	N/A	-----	01	00	00	00
				Whether Regular Chairperson appointed - Yes							
				Whether Chairperson is related to managing director or CEO - No							
				*to be filled only for Independent Director. Tenure would mean total period from which Independent Director is serving on the Board of Directors of the listed entity in continuity without any cooling off period.							

*The tenure of all the independent Director is calculated from the date of their appointment under new Companies Act, 2013.

II. Composition of Committees					
Name of Committee	Whether Regular Chairperson appointed	Name of Committee members	Category/(Chairperson/Executive/ Non- Executive/Independent/Nominee)	Date of appointment	
Audit Committee	Yes	Mr. Rajeev Mittal (Chairman) Mr. Prem Prakash Agarwal (Member) Mr. Pankaj Jain(Member)	Non-Executive & Independent Director Non-Executive & Independent Director Non-Executive & Independent Director	30-06-2001 01-01-2007 01-01-2007	

Nomination & Remuneration Committee	Yes	Mr. Prem Prakash Agarwal (Chairman) Mr. Pankaj Jain (Member) Mr. Ashok Kumar Mahawar (Member)	Non-Executive & Independent Director Non-Executive & Independent Director Non-Executive & Independent Director	01-01-2007 30-06-2008 06-05-2014
Risk Management Committee (if applicable)	N.A.	N.A	N.A	-
Stakeholders Relationship Committee	Yes	Mr. Pankaj Jain (Chairman) Mr. Apoorv Agarwal (Member) Mr. Prem Prakash Agarwal (Member)	Non-Executive & Independent Director Executive Director Non-Executive & Independent Director	01-01-2007 11-02-2021 30-06-2008

ANNEXURE - I

III. Meeting of Board of Directors					
Date(s) of Meeting (if any) in the previous quarter	Date(s) of Meeting (if any) in the relevant quarter	Whether requirement of Quorum met	Number of Directors Present (other than Independent Director)*	Number of Independent Director attending the meeting*	Maximum gap between any two consecutive meetings (in number of days)
May 28, 2021	-	Yes	3	4	-
-	August 13, 2021	Yes	3	4	76 days
*In SRU Steels Limited, the Board consists of total 7 Director. Accordingly, we have mentioned: Number of Director present (other than Independent Director): 03 (three) Number of Independent Director Present: 4 (Four)					

ANNEXURE - II

IV. Meeting of Committees


Date(s) of Meeting of Committee in the relevant quarter	Whether requirement of Quorum met (details)	Number of Directors present* (other than Independent Director)	Number of Independent Director	Date(s) of Meeting of Committee in the previous quarter	Maximum gap between any two consecutive meetings (in number of days)
1. Audit Committee					
August 13, 2021	Yes	0	3	May 28, 2021	76 days
2. Nomination and Remuneration Committee					
August 12, 2021	Yes	0	3	May 27, 2021	76 days
3. Investor Grievances Committee/ Shareholders Relationship Committee					
September 13, 2021	Yes	1	2	June 18, 2021	86 days

Annexure I

V. Related Party Transactions		
Subject		Compliance status (Yes/No/NA)
Whether prior approval of audit committee obtained		Yes
Whether shareholder approval obtained for material RPT		Yes*
Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee		Yes
* Company has approved the related party transaction with M/s Anant Overseas Private Limited in its Annual General Meeting held on 30th September, 2021. The respective disclosure required has been filled with the Stock Exchange and RBI..		
VI. Affirmations		

1. The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015.
2. The composition of the following committees is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015
a) Audit Committee b) Nomination & Remuneration Committee c) Stakeholders Relationship Committee d) Risk Management Committee (applicable to the top 500 listed entities)
3. The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
4. The meetings of the Board of Directors and the above committees have been conducted in the manner as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
5. This report and/or the report submitted in the previous quarter has been placed before Board of Directors. Any comments/observations/advice of Board of Directors may be mentioned here: The Board had taken note of the report of Corporate Governance of the Previous quarter ended on 30 th June, 2020, submitted in accordance with the SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 entered with the Stock Exchange. The Director read the report and they were satisfied about the content therein.

ANNEXURE -III

I. Affirmations		
Board Heading	Regulation Number	Compliance status (Yes/No/NA)
Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website	46 (2)	Yes
Presence of Chairperson of Audit Committee at the Annual General Meeting	18(1)(d)	Yes
Presence of Chairperson of the nomination and remuneration committee at the annual general meeting	19(3)	Yes
Presence of Chairperson of the Stakeholder Relationship committee at the annual general meeting	20(3)	Yes
Whether "Corporate Governance Report" disclosed in Annual Report	34(3) read with para C of Schedule V	Yes
 Shalla Garg Company Secretary and Compliance Officer		

I. Disclosure of Loan/ Guarantee/ Comfort letters/securities etc

(A) Any Loan or any other form of debt advanced by the listed entity directly or indirectly to:

Entity	Aggregate amount advanced during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	Nil	Nil
Promoter Group or any other entity controlled by them	Nil	Nil
Directors (including relatives) or any other entity controlled by them	Nil	Nil
KMPs or any other entity controlled by them	Nil	Nil

(B) Any guarantee/ comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type (guarantee, comfort letter etc.)	Aggregate amount of issuance during six months	Balance outstanding at the end of six months (taking into account any invocation)
Promoter or any other entity controlled by them	Nil	Nil	Nil
Promoter Group or any other entity controlled by them	Nil	Nil	Nil
Directors (including relatives) or any other entity controlled by them	Nil	Nil	Nil
KMPs or any other entity controlled by them	Nil	Nil	Nil

(C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by:

Entity	Type of security (cash, shares etc.)	Aggregate value of security provided during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	Nil	Nil	Nil
Promoter Group or any other entity controlled by them	Nil	Nil	Nil
Directors (including relatives) or any other entity controlled by them	Nil	Nil	Nil
KMPs or any other entity controlled by them	Nil	Nil	Nil

II. Affirmations:

All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company.



Arpit Agarwal
Chief Executive Officer
Investor Email Id: srusteels@yahoo.in
Date: 14/10/2021