May 29, 2026

To,
The Manager,
BSE Limited,
Dept. of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

To,
The Manager,
National Stock Exchange of India Limited,
Corporate Communication Department,
Exchange Plaza, Bandra - Kurla Complex,
Bandra (E), Mumbai – 400 051.

Scrip Code: 533239; Symbol: PRAKASHSTL
ISIN: INE696K01024

Sub.: Annual Secretarial Compliance Report for the year ended March 31, 2026.

Ref.: SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Dear Sir/Madam,

In terms of Clause 3(b)(iii) of the above referred SEBI circular, we are submitting the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2026, issued by S.K. Jain & Co. Practicing Company Secretary and the Secretarial Auditor of the Company.

This is for your information and records.

Thanking You,

Yours faithfully,
For **Prakash Steelage Limited**

Prakash C. Kanugo
Chairman & Managing Director
DIN: 00286366

Shubh Karan Jain (Dr.)
M.Com., L.L.B., FCS, Ph.D. MIA (USA)

S. K. Jain & Co.
Company Secretaries

SECRETARIAL COMPLIANCE REPORT

OF PRAKASH STEELAGE LIMITED

(CIN: L27106MH1991PLC061595)

FOR THE YEAR ENDED MARCH 31, 2026

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligation and Disclosures Requirements) Regulations, 2015]

I have examined:

(a) all the documents and records made available to us and explanation provided by **PRAKASH STEELAGE 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:

i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and

ii. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under 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;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the listed entity during the 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 to the listed entity during the review period)**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the review period)**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008; **(Not Applicable to the listed entity during the review period)**

(g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013; **(Not Applicable to the listed entity during the review period)**

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

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021. **(Not Applicable to the listed entity during the review period)**

(j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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and circulars/ guidelines issued there under.

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)	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 (PCS)	Manage -ment Response	Remarks
1.	Section 11C (5) of the SEBI Act, 1992	Section 11C (5) of the SEBI Act, 1992.	NA	SEBI	Summons	NA	NA	The matter remains pending and has not been concluded during the period of review.	Company has duly furnished all information and documents as sought from time to time. The Company has fully complied with the requirements of the said summons and is currently awaiting further communication/orde	NA

									r from SEBI in the matter as on date.	

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 in the previous reports	Observations made in the secretarial compliance report for the year ended 2025-2026	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
NA						

I 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 Standard The compliances of listed entities are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	**YES**	**None**

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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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	**YES**	**None**
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 re-directs to the relevant document(s)/ section of the website	**YES**	**None**
4.	Disqualification of Director: None of the Director of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	**YES**	**None**
5.	Details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries.	**NA**	**None**

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6.	<u>Preservation of Documents:</u> 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**	**None**
7.	<u>Performance Evaluation:</u> 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**	**None**
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (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	**YES** **N/A**	No such instances were observed during the period.
9.	<u>Disclosure of events or information:</u> 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**	**None**
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with		

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	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	**YES**	**None**
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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. Except as provided under separate paragraph herein	**YES**	SEBI has issued a Summons bearing reference No. SEBI/HO/CFID/SEC3/P/OW/2023/00000/2369 dated 27.03.2024 under Section 11(2), 11C (2), (3) of SEBI Act 1992 informing the Company that Mr. Deepesh M.U., Deputy General Manager has been appointed as Investigation Authority and the Company is required to produce or cause to produce the documents or information as listed out in the said Summons.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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**	During the year, there was no resignation of statutory auditors from the Company or any of its material subsidiaries.

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13.	<u>No Additional Non-compliances, if any:</u> No additional non-compliance observed any of the SEBI regulations/ circular/guidance note etc. except as reported above.	**NA**	No additional non-compliance was observed for the period under review.

***Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'**

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 report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

3. I have not verified the correctness and appropriateness of financial Records and Books of Accounts 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.

Place: Mumbai
Date: 27.05.2026
UDIN: F001473H000502886

For S.K. JAIN & Co.

S. K. JAIN & CO. MUMBAI FCS NO. 1473 CP. 3076 Company Secretary

Dr. S. K. Jain
Practicing Company Secretary
FCS No.: 1473
CP No.: 3076
Peer Review No.:6574/2025