Earthstahl & Alloys Limited

CIN: L27310CT2009PLC021487

Regd. Off.: Duldula Village, Simga Tehsil, Baloda Bazar, Chhattisgarh-493101

e-mail: secretarial@earthstahl.com; Ph: +91-8120009625/26; website: www.earthstahl.com

Dated: 13th November, 2026

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

Scrip Code: 543765

Sub: board Comments on fine levied by the BSE Limited.

Ref: E-mail dated 20th August, 2026 vide ref no. SOP-CReview/ QTR-Jun-26 issued by BSE Limited

Dear Sir/Ma'am,

With reference to the E-mail dated 20th August, 2026 (Enclosed herewith) and SEBI Master Circular HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026, we wish to inform you that a Board of Directors of the Company in its meeting held on **Friday, 13th September, 2026**, considered and took the note of fine levied by the BSE limited amounting of Rs. 1000/- plus applicable GST (total Rs. 1,180/-), for the one day delay in compliance of regulation 6(1) of SEBI (LODR) Regulation, 2015, with respect to non-appointment of qualified company secretary as compliance office within the stipulated time period of 3 months.

The Board of directors noted that the delay in appointment of qualified company as compliance officer was purely procedural in nature and was not attributed to intentional or wilful non-compliance on the part of the company. The delay arose due to appointee's existing professional commitments, pursuant to which he was able to assume the office with the company with effect from 01st May, 2026.

The Board further advised the Management to strengthen and streamline the internal procedures for timely identification and appointment of suitable candidates to ensure that any future vacancies arising in the Company are duly filled within the prescribed timelines and in compliance with applicable statutory requirements.

The Company is further committed to ensure timely compliance with all applicable regulatory requirements and to make all filings within the prescribed timelines going forward.

This is for your information and records.

Yours Sincerely,
For Earthstahl & Alloys Limited

ANKIT KUMAR DEWANGAN
Digitally signed by ANKIT KUMAR DEWANGAN
Date: 2026.11.13 18:28:27 +05'30'

Ankit Dewangan
Company Secretary

Earthstahl <secretarial@earthstahl.com>

543765-Fines as per SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 (Chapter VII (A)-Penal Action for Non-Compliance)

bse.soplodr <bse.soplodr@bseindia.com> Thu, Aug 20, 2026 at 5:53 PM
To: "secretarial@earthstahl.com" <secretarial@earthstahl.com>
Cc: "bse.soplodr" <bse.soplodr@bseindia.com>

Ref.: SOP-CReview/ QTR-Jun-26

To

The Company Secretary/Compliance Officer

Company Name: Earthstahl & Alloys Ltd

Scrip Code: 543765

Dear Sir/Madam,

Sub: Fines as per SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 (Chapter VII (A)-Penal Action for Non-Compliance)

The company is advised to refer to the SEBI Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 issued on July 11, 2023 and last updated on January 30,2026 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.

The Exchange had also issued a guidance note regarding the provisions of the said SEBI circular which is disseminated on the Exchange website at the following link:

https://www.bseindia.com/downloads1/Guidance_Note_for_SEBI_SOP_Circular.pdf

In this regard it is observed that the company is non-compliant/late compliant with the following Regulations for the period mentioned below:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine prescribed (*)	Fines levied for the quarter	Compliance status	Fine payable by the company as on August 20,2026 (inclusive of GST @ 18 %)		
				Basic Fine	GST @ 18 %	Total Fine payable
Regulation 13(3) Non-submission of the statement on shareholder complaints within the period prescribed under this regulation or under any circular issued in respect of redressal of investor grievances	Rs. 1,000/- per day till the date of compliance.	Jun-26	-	0	0	0
Regulation 76 of SEBI (Depositories & Participants) Regulation 2018 Non-submission of Reconciliation of share Capital audit Report.	NA	Jun-26	-	-		
Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Rs. 1,000 per day	Jun-26	Delayed Compliance	1000	180	1180
Regulation 7(1) Non-compliance with requirement to appoint	Rs. 1,000 per day	Jun-26	-	0	0	0

share transfer agent						
			Total	**1000**	**180**	**1180**

(*) As per the provisions of the circular the fines will continue to be computed further till the time of rectification of the non-compliance to the satisfaction of the Exchange or till the scrip of the listed entity is suspended from trading for non-compliance with aforesaid provisions.

The Company is therefore advised to note that as per the provisions of this circular:

- The company is required to ensure compliance with above regulation and ensure to pay the aforesaid fines including GST within 15 days from the date of this letter/email, **failing which Exchange shall, pursuant to the provisions of the aforesaid circular, initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter.** The company is advised to bring the provisions of this Circular to the notice of the promoter of the company. In this regard, it may also be noted that details of outstanding fines payable pursuant to SEBI SOP Circulars for the prior period, if any, will be provided separately. The SEBI circular stipulates that the freeze on promoter demat accounts should be lifted only after the company complies and pays all the outstanding fines.

- Further in the event of this being the second consecutive quarter of non-compliance for Regulation 76 would result in the company being transferred to Z group and liable for suspension of trading of its equity shares.

- The company is also advised to ensure that the subject matter of non-compliance which has been identified and indicated by the Exchange and any subsequent action taken by the Exchange in this regard shall be placed before the Board of Directors of the company in its next meeting. Comments made by the board shall be duly informed to the Exchange for dissemination.

Yours faithfully

Reena Raphel
Manager - Listing Compliance

Aarti Jadhav
Deputy Manager -Listing Compliance

In case of any further queries please email the following ids:

Particulars	**Email Id**
Query on compliance of Reg 6,7,76	Diya.Narwani@bseindia.com
Query on compliance of Reg 13(3)	Aarti.Jadhav@bseindia.com
Query on remittance	bse.soplodr@bseindia.com

Company is requested to remit the fine amount to the following designated **VIRTUAL BANK ACCOUNT** of the Exchange:

Company Name	Earthstahl & Alloys Ltd		
Account Name	**Bank Name & Branch**	**Virtual Bank Account No.***	**IFSC Code**
BSE Limited	ICICI Bank Ltd.- CMS Branch	BSER12939	ICIC0000104

Note: This bank account is specifically dedicated to SOP fines and waiver fees only, Therefore, company is advised not to deposit/credit any amount payable other than SOP fines/penalties/waiver fees.

The company is required to submit fine remittance details in the following format given at Annexure I to Email id: bse.soplodr@bseindia.com

Annexure-I (On letterhead of the company)

Sub: Details of Payment of fines for Non-Compliance with Regulations of SEBI (LODR) Regulations, 2015.

Remittance details:

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Scrip Code	Regulation & Quarter	Bank UTR number	Date of Payment	Amount paid	TDS deducted, if any	Net Amount paid

This mail is classified as 'CONFIDENTIAL' by Reena Raphel on August 20, 2026 at 17:53:41.