



**Aditya Ultra Steel Limited**

CIN L27100GJ 2011PLC066552

(Authorised Manufacturer of Kay2 Xenox Under Retail License User Agreement  
with Kamdhenu Metallic Industries Limited)

Office & Factory :

Survey No. 48, NH-8 A, Wankaner Boundary, Bhalgam, Dist. Rajkot, Gujarat - 363621.

Ph.: 6357585716 | Email : cs@aditya-ultra-steel.com | Web : www.aditya-ultra-steel.com



CML - 3847982



**Date:** 05/08/2025

To,  
The Manager,  
Listing Compliance Department,  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (E), Mumbai-400 051

**Sub.:**— **Intimation of Imposition of Penalty pursuant to Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

**Ref: Security Symbol: AUSL**

Dear Sir/Madam,

Pursuant to Regulation 30 of the SEBI Listing Regulations read with SEBI Circular no. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 and/or SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/P/CIR/2025/25 dated February 25, 2025 (the “SEBI Circular”) this is to inform you that the Company has received the Show Cause Notice Received from Registrar of Companies (ROC) Ahmedabad, Ministry of Corporate Affairs imposing the penalty on the Aditya Ultra Steel Limited (“the Company”), Directors and KMP of the company.

In respect of the captioned matter, I, the undersigned, state and declare that the information and details provided in **Form A** annexed to this letter, in compliance with Regulation 30(13) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, is true, correct and complete to the best of my/ (our) knowledge and belief.

Further, details as required under the applicable provisions of Regulation 30, read with schedule III, Part- A, Para- A, sub-para 20 are given as **Form B** annexed to this letter.

The company, Directors and KMP of the company contest the Show cause notice to waive or reduce the penalty/fine mentioned in the show cause notice. In some of the cases show cause notice received by Directors or KMP for non-compliance of period in which they were not director or KMP of the company i.e. there were not a director or KMP of the company at the time of non-compliance occurred.



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This is for your information and records.

Thanking You.  
Yours faithfully,

**For ADITYA ULTRA STEEL LIMITED**



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**Sunny Sunil Singhi**  
Managing Director  
DIN: 07210706



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## Form A

### DISCLOSURE BY ADITYA ULTRA STEEL LIMITED REGARDING RECEIPT OF COMMUNICATION FROM REGULATORY, STATUTORY, ENFORCEMENT OR JUDICIAL AUTHORITY UNDER THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015.

[Regulation 30(13) – Disclosure of communication from regulatory, statutory, enforcement or judicial authority]

Sr. No.	Particulars	Details
1.	Name of the listed company	Aditya Ultra Steel Limited
2.	Type of communication received	Show Cause Notice
3.	Date of receipt of communication	04/08/2025
4.	Authority from whom communication received	Registrar of Companies (ROC) Ahmedabad, Ministry of Corporate Affairs
5.	Brief summary of the material contents of the communication received, including reasons for receipt of the communication	<b>Brief summary &amp; reasons:</b> Show Cause Notice Received, on <b>Suo-moto adjudication application</b> filed by the company and Directors of the company, from Registrar of Companies (ROC) Ahmedabad, Ministry of Corporate Affairs imposing the penalty on the Company, Directors and KMP of the company. More details specified in Table mentioned hereunder.
6.	Period for which communication would be applicable, if stated	Details specified in Table mentioned hereunder.
7.	Expected financial implications on the listed company, if any	There is not much financial implications on the company as total proposed penalty imposed on the company is not more than 0.05% of total turnover of the company as on March-2025.
8.	Details of any aberrations/non-compliances identified by the authority in the communication	Details specified in Table mentioned hereunder.
9.	Details of any penalty or restriction or sanction imposed pursuant to the communication	Details specified in Table mentioned hereunder.
10.	Action(s) taken by listed company with respect to the communication	The company, Directors and KMP of the company contest the Show cause notice to waive or reduce the penalty/fine mentioned in the show cause notice. In some of the cases show cause notice received by Directors or KMP for non-compliance of period in which they were not director or KMP of the company i.e. they were not a director or KMP of the



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		company at the time of non-compliance occurred.
11.	Any other relevant information	Not applicable

**Details of Penalty:**

Sr. No.	Details of Non-Compliance	Period	Amount of Penalty Imposed (In Rs.)					
			Aditya Ultra Steel Limited	Sunny Sunil Singhi (Managing Director / Promoter)	Varun Manojkumar Jain (Non-executive Director / Promoter)	Varuna Varun Jain (Ex-Director / Promoter)	Amitkumar Harsukhbhai Sarena (CFO)	Vikas Babusingh Panwar (CS)
1.	The company / Officers have violated the Section 203(4) of the Companies Act, 2013 due to not filling the casual vacancy of CFO of the company.	01.10.2021 to 31.01.2022	5,00,000	1,72,000*	1,72,000	1,72,000	Not applicable	Not applicable
2.	The company / Officers have violated the Section 203(4) of the Companies Act, 2013 due to not filling the casual vacancy of CS of the company.	01.10.2021 to 24.01.2022	5,00,000	1,65,000	1,65,000	1,65,000	Not applicable	Not applicable
3.	Default of Section 149(4) of the Companies Act, 2013 read with Rules made thereunder.	01.04.2021 to 19.12.2023	3,00,000	1,00,000*	1,00,000	1,00,000	Not applicable	Not applicable
4.	Default of Section 177 of the Companies Act, 2013 read with Rule 6 of the Companies (Meeting of Board and its Power) Rules 2014.	01.04.2021 to 19.12.2023	5,00,000	Not Applicable	1,00,000	1,00,000	Not Applicable	Not Applicable
5.	Non-compliance of Section 196(2) of the Companies Act, 2013.	FY 2023-24	2,00,000	50,000	50,000	50,000	Not Applicable	Not Applicable
6.	Default of Section 196 of the Companies Act, 2013.	08.12.2021 to 17.07.2024	2,00,000	50,000	50,000	50,000	50,000#	50,000#
7.	Default of Section 134(3)(h) of the Companies Act, 2013 read with Rule 8 of the Companies (Accounts) Rules 2014.	FY 2020-21	3,00,000	Nil	50,000	50,000	Not applicable	Not applicable
8.	Default of Section 117(3) of the Companies Act, 2013 read with Rules made thereunder	FY 2022-23	95,200	50,000	50,000	50,000	50,000#	50,000#
9.	Default of Section 117(3) of the Companies Act, 2013 read with Rules made	2018 to 2021	2,00,000	50,000	50,000	50,000	50,000#	50,000#



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	thereunder							
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\* Mr. Sunny Sunil Singhi was not a Directors of the company at the time of occurrence of non-compliance.

# they were not a KMP of the company during the default occurred.



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## Form B

### DETAILS AS REQUIRED UNDER THE APPLICABLE PROVISIONS OF REGULATION 30, READ WITH SCHEDULE III, PART- A, PARA- A, SUB-PARA 20:

Sr. No.	Particulars	Details
1.	Name of the authority	Registrar of Companies (ROC) Ahmedabad, Ministry of Corporate Affairs
2.	Nature and details of the action(s) taken or order(s) passed	<b>Brief summary &amp; reasons:</b> Show Cause Notice Received, on <b>Suo-moto adjudication application</b> filed by the company and Directors of the company, from Registrar of Companies (ROC) Ahmedabad, Ministry of Corporate Affairs imposing the penalty on the Company, Directors and KMP of the company. More details specified in Table mentioned above.
3.	Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;	04/08/2025
4.	Details of the violation(s)/contravention(s) committed or alleged to be committed	Details specified in Table mentioned above.
5.	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.	There is not much Impact on financial, operation or other activities of the company as total proposed penalty imposed on the company is not more than 0.05% of total turnover of the company as on March-2025.