

May 30, 2025

The National Stock Exchange of India Ltd  
"Exchange Plaza", Bandra Kurla Complex,  
Bandra East,  
Mumbai - 400 051  
(Scrip Code - SHIVAMAUTO)

The BSE Limited  
Phiroje Jeejeebhoy Towers  
Dalal Street Fort  
Mumbai - 400 001  
(Scrip Code - 532776)

**Sub: Compliance under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015.**

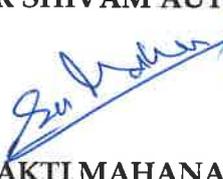
Dear Sir(s),

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2021 and pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclose herewith Secretarial Compliance Report duly issued by Yogesh k & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2025.

Kindly take the above information on your record and oblige.

Thanking you.

**FOR SHIVAM AUTOTECH LIMITED**

  
  
**SHAKTI MAHANA**  
**COMPANY SECRETARY**  
**M.NO. A69273**

**SHIVAM AUTOTECH LIMITED [www.shivamautotech.com](http://www.shivamautotech.com)**  
**CIN: L34300HR2005PLC081531**

**Registered Office: 10, 1<sup>st</sup> Floor, Emaar Digital Greens, Tower A, Sector  
61, Golf Course Extension Road, Gurugram, Haryana-122102**

**Tel: 0124-4698700**  
**Fax: 0124-4698798**

# Yogesh K & Associates

## Company Secretaries

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To,  
Board of directors  
Shivam Autotech Limited  
CIN:- L34300HR2005PLC081531  
10, 1st Floor, Tower A, Emaar Digital Greens,  
Sector - 61, Golf Course Extension Road,  
Gurugram, Haryana, India, 122102

**Sub: Annual Secretarial Compliance Report for the Financial Year 2024-25.**

We have been engaged by SHIVAM AUTOTECH LIMITED (the "Company"), having Corporate Identification Number (CIN): L34300HR2005PLC081531. The Company's equity shares are listed on the Bombay Stock Exchange (BSE) and the National Stock Exchange (NSE). Our engagement involves conducting an audit in compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

Our role entails verifying the Company's compliance with the provisions of all applicable Regulations, Circulars, and Guidelines issued by SEBI. We conduct our audit in line with the SEBI Master Circular No.SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 and guidance note on the "Annual Secretarial Compliance Report" issued by the Institute of Company Secretaries of India (ICSI). Our approach involves thorough examinations and verifications deemed necessary and adequate for this purpose.

The Annual Secretarial Compliance Report is enclosed for your perusal.

**Place: New Delhi**  
**Date: 30/05/2025**

**For Yogesh K & Associates**  
**(Company Secretaries)**

**Yogesh Kumar** Digitally signed by  
Yogesh Kumar  
Date: 2025.05.30  
18:04:00 +05'30'

**CS Yogesh Kumar**  
**Proprietor**

**M. No. A60866**

**C.P. No. 23576**

**PR 4659/2023**

**Firm Registration No. S2023DE945100**

**UDIN: A060866G000512977**

**Address-10/58, basement, Vikram Vihar, Lajpat Nagar-IV, Delhi-110024**

**[Email-ypaandcompany@gmail.com](mailto:Email-ypaandcompany@gmail.com), Cont-9315259390**

**"Speak the Truth, Abide by the Law"**

# Yogesh K & Associates

## Company Secretaries

### SECRETARIAL COMPLIANCE REPORT OF SHIVAM AUTOTECH LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025

We, M/s. Yogesh K & Associates., Practicing Company Secretaries, have examined:

- a) all the documents and records made available to us and explanation provided by Shivam Autotech 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 certification.

for the financial year ended on March 31, 2025 (“Review Period”) in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

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;
- 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 Non-Convertible Securities) Regulations, 2021 **(Not Applicable to the listed entity during the Review Period);**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (applicable to the Company to the extent of Compliance of Regulation 76)

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the review period:

I (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters as specified below:

Sr. No.	Compliance Requirement (Regulation s/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	As per Regulation 23 (9) of SEBI (LODR), 2015, the Company is required to disclose RPTs on in every 6 Months basis within specified time from closure of board meeting in which financial were approved.  The Company has approved the half yearly financial statement for the period ended on 31 <sup>st</sup> March, 2024 on 27 <sup>th</sup> day of May, 2024. Disclosure should be given within specified time from 27 <sup>th</sup> day of May, 2024, being the date of Board Meeting.  Intimation was given on 28 <sup>th</sup> day of May, 2024.	Regulation 23 (9) of SEBI (LODR), 2015	Late Intimation to Stock Exchange	1.NSE & 2. BSE	Fin e.	Late Intimation	BSE- 5,000 (Rs. Five Thousand ds),  NSE- 5,000 (Rs. Five Thousand ds)	Late Intimation to Stock Exchange under regulation 23 of SEBI (LODR), 2015	Owing to technical difficulties, the Company's submission of the Related Party Transaction (RPT) disclosure to the Stock Exchange was delayed. We will ensure timely compliance in future.	1 day delay in intimation
2	The Company has issued optionally	Regulation 28 (1)	In-principle	Application	Fin e.	In-principle	NSE- 59000 (imposed)	In-principle	The company's failure to obtain in-principle approval	In-principle

	convertible debentures on a private placement basis during the period previous to the period under review, in-principle approval from stock exchanges has not been obtained as required under Regulation 28 (1) of SEBI (LODR) Regulations, 2015.  NSE and BSE both imposed fine on the listed entity dated on 14 <sup>th</sup> December, 2023 and 15 <sup>th</sup> April, 2025 respectively.	of SEBI (LODR) Regulations, 2015.	approval from BSE & NSE has not been obtained.	rejected by NSE & BSE and fine imposed by both NSE & BSE		Approval has not been obtained.	in 2023-24) BSE-59000 (imposed on 15 <sup>th</sup> April, 2025)  Fine paid to both the stock exchanges.	approval has not been obtained.	stemmed from inadequate particulars concerning its ultimate beneficial owners.  This omission was subsequently rectified via ratification in a postal ballot notice dated November 21, 2024.  The company has successfully obtained the requisite listing approvals from both the National Stock Exchange (NSE) and the Bombay Stock Exchange (BSE).	approval Has not been obtained.
3	NSE has issued Advisory Letter for non-compliance of the proviso Regulation 167(2) under SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.  NSE has observed that 250 unlisted secured Optionally Convertible Debentures were not kept under lock-in resulting into non-compliance of proviso of Regulation 167(2) of SEBI (ICDR) Regulations, 2018.	Regulation 167(2) of SEBI (ICDR) Regulations, 2018	250 unlisted secured Optionally Convertible Debentures were not kept under lock-in	Advisory issued by NSE	Advisory	Advisory issued by NSE	Advisory issued by NSE	Advisory issued by NSE	The Company has duly acknowledged the advisory letter received from the National Stock Exchange (NSE) and has implemented robust and stringent measures to ensure complete compliance with all applicable regulations. Further, necessary steps have been taken to prevent the recurrence of such non-compliance in the future.	Advisory issued by NSE

(b) The listed entity has taken following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
<b>Please refer below and annexure-1 (page no. 1-4)</b>										

1. As per regulation 30 (6) read with para A of part A of Schedule III of SEBI (LODR), 2015, action taken by stock exchanges need to disclosure to stock exchanges.

Further as per information provide to us, stock exchanges has imposed fine for followings (more details of which are part of annexure -1 of this secretarial compliance report).

1. Composition of Board,
2. Late intimation of related party disclosure for half yearly ended on 30<sup>th</sup> of September, 2023,
3. Action taken in relation to not obtaining in-principle approval,
4. Delay in prior intimation of board meeting held on 2<sup>nd</sup> of July, 2023.

#### MANAGEMENT REPLY:

1. As per Reg.17 (1E) of SEBI (LODR),2015 Any casual vacancy in the office of a director shall be filled by the company at the earliest and in any case not later than three months from the date such vacancy. The Company has complied with the same within three months. Further with reference to the fine imposed by the stock exchange, the same has been paid by the company.
  2. Reference to late filling, fine impose by stock exchange paid by the company.
  3. The company has filled the application timely with stock exchanges for taking in-principal approval, but as company was unable to clarify observations. The company is following up with the stock exchanges to consider the company reply and grant of In-principle approval.
  4. Due to some technical issues company has filled the Notice with stock exchanges lately. Further with reference to this fine impose by stock exchange paid by the same.
2. Followings were not been updated:
  1. Annual return (MGT-9) was not available for the period under review.
  2. Revision in credit rating was updated, last updated on September 26, 2022.
  3. Disclosure under regulation 30 of listing SEBI (LODR), 2015.

#### MANAGEMENT REPLY:

The Company is in compliance of the requirement of website updation as on date.

II. We 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.	<b><u>Secretarial Standards:</u></b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118 (10) of the Companies Act, 2013 and mandatorily applicable.	Yes	-
2.	<b><u>Adoption and timely updation of the Policies:</u></b>	Yes	-

	<ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations /circulars/guidelines issued by SEBI.</li> </ul>		
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/ information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance reports under Regulation 27 (2) of Listing Regulations are accurate and specific which redirects to the relevant document(s)/section of the website.</li> </ul>	Yes	-
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Directors of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	-
5.	<p><b><u>Details related to Subsidiaries of listed entity have been examined w.r.t.:</u></b></p> <p>(a) Identification of material subsidiary companies. (b) Disclosure requirements of material as well as other subsidiaries.</p>	(a) NA (b) NA	The listed entity does not have any subsidiary and material subsidiary.
6.	<p><b><u>Preservation of Documents:</u></b></p>		

	As per the confirmations given by the listed entity, and on our test check basis, listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records is as per Policy of Preservation of Documents and Archival policy prescribed under SEBI (LODR).	Yes	-
7.	<b><u>Performance Evaluation:</u></b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees on an annual basis as prescribed in SEBI Regulations.	Yes	-
8.	<b><u>Related Party Transactions:</u></b>  (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.	a) Yes  b) Yes	a) -  b) -
9.	<b><u>Disclosure of events or information:</u></b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of Listing Regulations within the time limits prescribed thereunder except as specified in this report.	No	As per regulation 30 (6) read with para A of part A of Schedule III of SEBI (LODR), 2015 , Action taken by stock exchanges need to disclosure to stock exchanges.  Further as per information provide to us, stock exchanges has imposed fine for late intimation of related party disclosure for half year ended on 31 <sup>st</sup> Day of March, 2024.
10.	<b><u>Prohibition of Insider Trading:</u></b>  The listed entity is in compliance with Regulation 3 (5) & 3 (6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b>	No	Following actions has been taken by stock exchanges:

	<p>No Actions (except as specified in this report) have 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.</p>		<ol style="list-style-type: none"> <li>1. Imposition of fine due to late intimation of related party transactions as required under regulation 23 (9) of SEBI (LODR), 2015 for the period ended on 31<sup>st</sup> March, 2024.</li> <li>2. In-principle approval has not been obtained in relation to private placement of optionally convertible debentures issued in second quarter of financial year 2023-24.</li> </ol> <p>Further NSE and BSE both imposed fine on the listed entity dated on 14<sup>th</sup> December, 2023 and 15<sup>th</sup> April, 2025 respectively.</p> <ol style="list-style-type: none"> <li>3. NSE has issued Advisory Letter for non-compliance of the proviso Regulation 167(2) under SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 for 250 unlisted secured Optionally Convertible Debentures were not kept under lock-in.</li> </ol>
12.	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></p> <p>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.</p>		
13.	<p><b><u>Additional non-compliances, if any:</u></b></p> <p>To the best of our knowledge, no additional non-compliance observed for any SEBI regulation/circular/guidance note, etc.</p>	NA	

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

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. -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 certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We 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 Listing Regulations 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: New Delhi**  
**Date: 30/05/2025**

**For Yogesh K & Associates**  
**(Company Secretaries)**

**Yogesh** Digitally signed  
by Yogesh Kumar  
**Kumar** Date: 2025.05.30  
18:08:34 +05'30'

**CS Yogesh Kumar**  
**Proprietor**

**M. No. A60866**

**C.P. No. 23576**

**PR 4659/2023**

**Firm Registration No. S2023DE945100**

**UDIN: A060866G000512977**

## ANNEXURE-1

Sr. No.	Compliance Requirement (Regulation s/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	<p><b>COMPOSITION OF BOARD:</b></p> <p>As per Regulation 17(1) of SEBI (LODR), 2015, the Composition of Board must contain at least 6 Directors.</p> <p>As per Corporate Governance Report for Quarter-1, there were five Directors in the Board Namely, 1. Shri. Yogesh Munjal, 2. Mr. Neeraj Munjal, 3. Mrs. Charu Munjal, 4. Mr. Sunil Chinu Bhai Vakil, 5. Mr. Anil Kumar Gupta.</p> <p>Company was not in compliance with the requirements pertaining to the composition of the Board For the quarter ended June 2023.</p> <p>Further composition has completed as 02.07.2023. Furthermore there must be at least six directors in the company and in current scenario at least 1/2 must be independent directors.</p> <p>Further, the notice from BSE and NSE received on 21-08-2023.</p>	Regulation n 17 of SEBI (LODR), 2015.	Composition of board was not as per requirements of provisions of Regulation 17 of SEBI(LODR), 2015 Read with other provisions of SEBI (LODR), 2015	1. BSE and 2. NSE	Cost imposed (Fine).	Composition of Board was not Proper during 28th of April, 2023 to 1st July, 2023.	<p>BSE-Rs. 218,300/- (Rupees Two Lakhs Eighteen Thousand Three Hundred Only/-)</p> <p>NSE-Rs. 218,300/- (Rupees Two Lakhs Eighteen Thousand Three Hundred Only/-)</p> <p>As per information provided to us the company has paid these penalties on 16th of September, 2023 and 26th of September, 2023 respectively.</p>	<p>Mr. Bhagwan Dass Narang (Chairman &amp; Independent Director) and Mrs. Jyothi Prasad (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD- SEC-4- 26042/2023-24 Dated 28th April, 2023.</p> <p><i>The Company does not have Composition of Board of Directors as required under regulation 17 of SEBI (LODR), 2015 during the period starting from 28th of April, 2023 till 2nd of July, 2023.</i></p> <p><i>Further the provisions of composition of board of Board of Directors as required under regulation 17 of SEBI(LODR), 2015 were Comply on 02.07.2023 after appointing Ms. Neekita Batra.</i></p>	<p><b>As per Reg.17 (1E) of SEBI (LODR),2015 Any casual vacancy in the office of a director shall be filled by the company at the earliest and in any case not later than three months from the date such vacancy.</b></p> <p>The Company has complied with the same within three months. Further with reference to the fine imposed by the stock exchange, the same has been paid by the Company.</p>	<p>Due to Cessation of office of Mr. Bhagwan Das and Ms. Jyothi Prasad, The Board fails to comply the requirement of composition.</p> <p>Further the provisions of composition of Board were comply on 02.07.2023 after appointing Ms. Neekita Batra.</p>

<p><b>COMPOSITION OF NOMINATION AND REMUNERATION COMMITTEE (NRC):</b></p> <p>During the period starting from 28th April, 2023, due to cessation of office of Mr. Bhagwan Dass Narang (Chairman &amp; Independent Director) and Mrs. Jyothi Prasad (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD - SEC-4- 26042/2023-24 dated 28th April, 2023. Following were the members of Nomination and remuneration Committee namely 1. Mr. Sunil Chinubhai Vakil and 2. Dr. Anil Kumar Gupta.</p> <p>As per requirement of Regulation 19 of SEBI (LODR), 2015, the Committee shall comprised at least three directors and all directors of the Committee shall be non-executive directors out of them at least two third (2/3) shall be independent directors.</p> <p>Further as per minutes of the Nomination and remuneration committee meeting held on 25th of May, 2023 there were two members as members of Committee Namely 1. Mr. Sunil Chinubhai Vakil as Chairperson and Dr. Anil Kumar Gupta being Non-Executive Director as on date as member.</p> <p>In Board meeting held on 25th of May, 2023, Mr. Yogesh Chander Munjal was appointed as new member of nomination and remuneration committee and designation of Dr. Anil Kumar Gupta was changed from non- executive to non-executive and independent director. So after new appointed and change in designation there were three members in Committee namely 1. Mr. Sunil Chinubhai Vakil as Chairperson, Dr. Anil Kumar Gupta as member and Mr. Yogesh Chander Munjal as member.</p>	<p>Regulation 19 of SEBI (LODR), 2015.</p>	<p>Composition of board was not as per requirements of provisions of Regulation 19 of SEBI(LODR), 2015 Read with other provisions of SEBI (LODR), 2015</p>	-	-	-	-	-	<p>Mr. Bhagwan Dass Narang (Chairman &amp; Independent Director) and Mrs. Jyothi Prasad (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD - SEC-4- 26042/2023-24 Dated 28<sup>th</sup> April, 2023.</p> <p>The Composition of Nomination and Remuneration Committee was not as per law from 28th April, 2023 till 25<sup>th</sup> of May, 2023.</p> <p>Mr. Yogesh Chander Munjal was appointed as new member of nomination and remuneration committee on 25<sup>th</sup> of May, 2023.</p>	<p><b>As per Reg.17(1E) of SEBI (LODR),2015 Any casual vacancy in the office of a director shall be filled by the company at the earliest and in any case not later than three months from the date such vacancy.</b></p> <p><b>The Company has complied with the same within three months. Further with reference to the fine imposed by the stock exchange, the same has been paid by the company.</b></p>	<p>Due to Cessation of office of Mr. Bhagwan Das and Ms. Jyothi Prasad, The Board fails to comply the requirement of composition .</p> <p>Further the Listed entity was in compliances of the requirement of regulation 19 of SEBI (LODR), 2015 after the Board meeting held on 25<sup>th</sup> of May, 2023.</p>
<p><b>RECONCILIATION OF SHARE CAPITAL AUDIT REPORT:</b></p> <p>Reconciliation of Share Capital Audit Report for quarter ended 30th September, 2023 was filed on 1st of November, 2023. The last date of intimation was 30th October, 2023.</p>	<p>76 of SEBI (DP) Regulations, 2028</p>	<p>delay</p>	-	-	-	-	-	<p><i>Reconciliation of Share Capital Audit Report for quarter ended 30th September, 2023 was filed on 1st of November, 2023. The last date of intimation was 30th October, 2023.</i></p>	<p>Due to technical issues encountered the Company has filled the Reconciliation of share capital Audit with stock exchanges lately.</p>	<p>1 day delay in intimation</p>

<p><b>DISCLOSURE OF RELATED PARTY TRANSACTIONS(RPTs):</b></p> <p>As per Regulation 23 (9) of SEBI (LODR), 2015, the Company is required to disclose RPTs on in every 6 Months basis within 24 hours from closure of board meeting in which financial were approved.</p> <p>4 The Company has approved the half yearly financial statement on 9<sup>th</sup> of November, 2023. Disclosure should be given in 24 hours (ie on or before 5:30 on 10th November, 2023) from 9<sup>th</sup> November, 2023 Board Meeting.</p> <p>Intimation was given on 15<sup>th</sup> of November, 2023.</p>	<p>Regulation 23 (9) of SEBI (LODR), 2015</p>	<p>late Intimation to Stock Exchanges</p>	<p>1. BSE and 2. NSE</p>	<p>Cost imposed (ie. Fine).</p>	<p>Late intimation</p>	<p>BSE-Rs. 35,400/- (Rupees Thirty Five Thousand Four Hundred Only/-)</p> <p>NSE-Rs. 35,400/- (Rupees Thirty Five Thousand Four Hundred Only/-)</p>	<p><i>The Company has approved the half yearly financial statement on 9<sup>th</sup> of November, 2023. disclosure should be given in 24 hours (ie on or before 5:30 on 10th November, 2023) from 9<sup>th</sup> November, 2023 Board Meeting.</i></p>	<p>Reference to this fine imposed by stock exchange paid by the company.</p>	<p>Intimation was given on 15<sup>th</sup> of November, 2023.</p>
<p><b>IN-PRINCIPLE APPROVAL UNDER REGULATION 28 (1) OF SEBI (LODR) REGULATIONS, 2015 READ WITH REGULATION 163 OF SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018</b></p> <p>5 The Company has issued optionally convertible debentures on a private placement basis during the period under review, in principle approval from stock exchanges remains to be obtained.</p> <p>The listed entity although applied for in-principle approval to BSE and NSE but both the stock exchanges asked for details of details of identity of the natural persons who are the ultimate beneficial owners of the shares proposed to be allotted and/or who ultimately control the proposed allottees. The entity did not provide the requisite information to both the stock exchanges.</p> <p>NSE has rejected the application.</p>	<p>Regulation 28 of SEBI (LODR), 2015.</p>	<p>In-principle approval from BSE and NSE remains to be obtain.</p>	<p>Application rejected by NSE and fine imposed</p>	<p>Fine</p>	<p>In-principle approval</p>	<p>NSE-59000 BSE-0.00</p>	<p>In-principle approval remains to be obtained.</p>	<p>The company has filled the application timely with stock exchanges for taking In principal approval, but as company was unable to clarify observations.</p> <p>The company resolving the same at earliest</p>	<p>In-principle approval remains to be obtained</p>
<p><b>CLOSURE OF TRADING WINDOW: pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015:</b></p> <p>6 For September, 2023 quarter, Closure of trading window intimation was given on 4th October, 2023, the last date of intimation was 30th September, 2023.</p>	<p>SEBI (PIT) Regulation, 2015</p>	<p>late Intimation to Stock Exchanges</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>Late intimation for quarter ended September, 2023.</p>	<p>Due to no availability of signatories, the company has filled the Intimation with stock exchanges lately.</p>	<p>late intimation</p>

<p><b>INTIMATION UNDER REGULATION 29 OF SEBI (LODR), 2015:</b></p> <p>Prior intimation of Board Meeting held on 2nd of July, 2023 was not on time.</p>	<p>29 of SEBI (LODR), 2015</p>	<p>late prior Intimation to Stock Exchanges</p>	<p>Fine</p>	<p>fine</p>	<p>late prior Intimation</p>	<p>NSE-11800 BSE-11800</p>	<p>Prior intimation of Board Meeting held on 2nd of July, 2023 was not on time.</p>	<p><b>Due to some technical issues company has filled the Notice with stock exchanges lately.</b></p> <p>Further with reference to this fine impose by stock exchange paid by the same.</p>	<p>Delay in Prior intimation.</p>
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**Place: New Delhi**  
**Date: 30/05/2025**

**For Yogesh K & Associates**  
**(Company Secretaries)**

**Yogesh Kumar** Digitally signed by Yogesh Kumar  
Date: 2025.05.30 18:10:36 +05'30'

**CS Yogesh Kumar**  
**Proprietor**  
**M. No. A60866**  
**C.P. No. 23576**  
**PR 4659/2023**

**Firm Registration No. S2023DE945100**  
**UDIN: A060866G000512977**