

**Date: 12.06.2025**

To  
Listing Compliance, CRD  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400001.

To  
Listing Compliance Department  
Calcutta Stock Exchange Limited  
7, Lyons Range, Dalhousie,  
Kolkata- 700001  
West Bengal

**Dear Sir,**

**Ref: Stock Code - 530039 – LORDS CHEMICALS LIMITED**

**Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year ended 31<sup>st</sup> March, 2025.**

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As required under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report issued by Mr. Hemant Sharma (membership No.: 42264, COP No.: 17411), Proprietor of Hemant Sharma & Associates, Practising Company Secretaries, Kolkata for the Financial Year Ended on 31<sup>st</sup> March, 2025.

Kindly take the same on your record.

Thanking you,

Yours faithfully,

For **LORDS CHEMICALS LIMITED**

**AJAY KUMAR JAIN**  
**MANAGING DIRECTOR**  
**DIN: 00499309**

**Address: 1/1A, Mahendra Roy Lane, P S Pace Building, Room#705A,**  
**7th Floor, Kolkata-700 046**

**Encl – As above**

**SECRETARIAL COMPLIANCE REPORT OF**  
**LORDS CHEMICALS LIMITED**  
**For the Financial Year ended March 31, 2025**

**I/We have examined:**

- (a) all the documents and records made available to us and explanation provided by **LORDS CHEMICALS 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, 2025 ("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 thereunder; and
- (ii) 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: **Not Applicable as no such reportable event during the period under review;**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011: **Not Applicable as no such reportable event during the period under review;**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: **Not Applicable as no such reportable event during the period under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021: **Not Applicable as no such reportable event during the period under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021: **Not Applicable as Company has not issued and/or listed any of the Non-Convertible Securities;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Other regulations as applicable

and circulars/ guidelines issued thereunder;

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:

| Sl. No | Compliance Requirement (Regulations/ circulars/ guide- lines 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                                                       | Re- marks |
|--------|-----------------------------------------------------------------------------------------|--------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-----------|
| 1      | Appointment of Qualified Company Secretary as Compliance Officer                        | Regn 6 of LODR           | Non appointment                                                                              | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non compliance as no Compliance Officer was appointed                                                                                                                                                                                                  | Company is under the suspension | Non appointment of Compliance Officer for the Review Period under consideration                                                                                                                                                                        | Company is under the process of taking the requisite step in this regard  |           |
| 2      | Compliance Certificate from the Share Transfer Agent                                    | Regn 7(3) of LODR        | Delayed submission                                                                           | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delay in submission of the Compliance Certificate for the year ended 31.03.2024 on 23.01.2025                                                                                                                                                          | Company is under the suspension | The Compliance Certificate for the year ended 31.03.2024 was submitted on 23.01.2025 after the due date of submission as per the LODR i.e. within 30 days from the end of the year (30.04.2024)                                                        | Company is under the process of taking the requisite step in this regard  |           |
| 3      | Submission of Quarterly Investor Grievance Report                                       | Regn 13(3) of LODR       | Delayed submission of the Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 02.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 10.01.2025 | Company is under the suspension | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 02.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 10.01.2025 | Company is under the process of taking the requisite steps in this regard |           |
| 4      | Payment of Annual Listing Fees                                                          | Regn 14 of LODR          | Non-payment                                                                                  | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance as no payment of Annual Listing Fees is made for the Review Period under Consideration                                                                                                                                                  | Company is under the process of making payment of the outstanding fees    |           |

# HEMANT SHARMA & ASSOCIATES

Practicing Company Secretaries

Bhikhan Chand Market, Room No. 409,  
4<sup>th</sup> Floor, 14/2, Old China Bazar Street,  
Kolkata-700001, Ph: +91 8282817578  
Email: sharmahemant619@gmail.com

|    |                                                                               |                                            |                                                                                              |                                                                                        |                                                                                  |                                                                                                                                                                                                                                                        |                                 |                                                                                                                                                                                                                                                        |                                                                           |  |
|----|-------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--|
| 5  | Half Yearly Report on Related Party Transactions                              | Regn 23(9) of LODR                         | Non-Compliance observed with respect to both the half years falling within the Review Period | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the Report as required under Regn 23(9) of SEBI LODR for both the half years falling within the Review Period                                                                                                  | Company is under the process of taking the requisite step in this regard  |  |
| 6  | Submission of Annual Secretarial Compliance Report                            | Regn 24A of LODR                           | Non-Compliance                                                                               | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the Report as required under Regn 24A of SEBI LODR                                                                                                                                                             | Company is under the process of taking the requisite step in this regard  |  |
| 7  | Submission of Quarterly Corporate Governance Report                           | Regn 27 of the LODR                        | Non-Compliance observed with respect to all the quarters falling within the Review Period    | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the Report as required under Regn 27 of SEBI LODR for all the quarters falling within the Review Period                                                                                                        | Company is under the process of taking the requisite step in this regard  |  |
| 8  | Submission of Prior Intimations of the Board Meetings                         | Regn 29(1) of the LODR                     | Non-Compliance                                                                               | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the documents as required under Regn 29(1) of SEBI LODR                                                                                                                                                        | Company is under the process of taking the requisite step in this regard  |  |
| 9  | Submission of Outcome of Board Meeting for consideration of Financial Results | Regn 30 read with Schedule III of the LODR | Non-Compliance                                                                               | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the Financial Results as required under Regn 30 read with Schedule III of SEBI LODR                                                                                                                            | Company is under the process of taking the requisite step in this regard  |  |
| 10 | Submission of Quarterly Shareholding Pattern                                  | Regn 31 of the LODR                        | Delayed submission of the Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 19.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 19.01.2025 | Company is under the suspension | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 19.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 19.01.2025 | Company is under the process of taking the requisite steps in this regard |  |

HEMANT SHARMA Digitally signed by  
HEMANT SHARMA  
Date: 2025.06.11  
23:38:11 +05'30'

|    |                                                                                                         |                                  |                                                                                           |                                                                                        |                                                                                  |                                                                                               |                                 |                                                                                                                                                                                                                 |                                                                                                                                                                                            |  |
|----|---------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 11 | Submission of Quarterly Financial Results                                                               | Regn 33 of the LODR              | Non-Compliance observed with respect to all the quarters falling within the Review Period | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                | Company is under the suspension | Non-compliance due to non-submission of the Report as required under Regn 33 of SEBI LODR for all the quarters falling within the Review Period                                                                 | Company is under the process of taking the requisite step in this regard                                                                                                                   |  |
| 12 | Submission of Annual Report                                                                             | Regn 34 of the LODR              | Non-Compliance                                                                            | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-Compliance                                                                                | Company is under the suspension | No AGM was held for the year 2023-24 and hence, no Annual Report was submitted with BSE                                                                                                                         |                                                                                                                                                                                            |  |
| 13 | Sending documents and information to Shareholders (Annual Report)                                       | Regn 36 of the LODR              | Non-Compliance                                                                            | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                | Company is under the suspension | Non-compliance due to non-submission of the Report as required under Regn 36 of SEBI LODR                                                                                                                       | Company is under the process of taking the requisite step in this regard                                                                                                                   |  |
| 14 | Certificate from the Practicing Company Secretary relating to share transfer or transmission activities | Regn 40 of the LODR              | Delayed Compliance                                                                        | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delayed Compliance                                                                            | Company is under the suspension | The Compliance Certificate from PCS for the year ended 31.03.2024 was submitted on 11.01.2025 after the due date of submission as per the LODR i.e. within 30 days from the end of the year (30.04.2024)        | Company is under the process of taking the requisite step in this regard                                                                                                                   |  |
| 15 | Publication of Newspaper Advertisement wrt Quarterly Financial Results                                  | Regn 47 of the LODR              | Non-Compliance                                                                            | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                | Company is under the suspension | Non-compliance due to non-submission of the Quarterly Financial Results as required under Regn 33 of SEBI LODR. Therefore, no results was published in the Newspaper as required under Regn 47 of the SEBI LODR | Necessary steps will be taken upon submission of the Quarterly Financial Results with the BSE and the same shall be published as well as disseminated to the BSE within due course in time |  |
| 16 | Submission of Annual Declaration under Regn 31(4) of the SEBI Takeover Code/SEBI SAST Regn              | Regn 31(4) of the SEBI SAST Regn | Delayed Compliance                                                                        | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delayed compliance. The Declaration for the year ended 31.03.2024 was submitted on 08.01.2025 | Company is under the suspension | Delayed Compliance of the declaration for the year ended 31.03.2024. The submission was made on 08.01.2025                                                                                                      | Company is under the process of taking necessary steps in this regard                                                                                                                      |  |

|    |                                                                 |                                                                                                   |                                                                                                                           |                                                                                        |                                                                                  |                                                                                                                                                                                                                                                        |                                 |                                                                                                                                                                                                                                                        |                                                                           |  |
|----|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--|
| 17 | Submission of Reconciliation of Share Capital Audit Report      | Regn 76 of SEBI (D&P) Regulations, 2018                                                           | Delayed submission of the Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024                              | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 11.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 11.01.2025 | Company is under the suspension | Delayed submission of the Report for 3 Quarters under Review. Report for the Quarter Ended 31.03.2024, 30.06.2024 and 30.09.2024 was submitted on 11.01.2025 and for the Quarter Ended 31.12.2024 was submitted within the timeline i.e. on 11.01.2025 | Company is under the process of taking the requisite steps in this regard |  |
| 18 | Quarterly Submission of SDD Compliance Certificate              | Regn 3(5) and 3(6) of SEBI (PIT) Regulations, 2015                                                | Non-Compliance observed with respect to all the quarters falling within the Review Period                                 | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-compliance                                                                                                                                                                                                                                         | Company is under the suspension | Non-compliance due to non-submission of the Compliance Certificate as required under Regn 3(5) and 3(6) of SEBI PIT Regulations, 2015 for all the quarters falling within the Review Period                                                            | The Company has procured the SDD Software on 03.01.2025                   |  |
| 19 | Incomplete Composition of Board of Director                     | Regn 17 of the LODR                                                                               | Incomplete composition till 15.02.2025. New appointment to comply with the regulatory requirements was made on 15.02.2025 | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Incomplete Composition                                                                                                                                                                                                                                 | Company is under the suspension | Appointment to Board to rectify the non-compliance was made on 15.02.2025                                                                                                                                                                              |                                                                           |  |
| 20 | Incomplete Composition of Nomination and Remuneration Committee | Regn 19 of the LODR                                                                               | Incomplete composition till 15.02.2025                                                                                    | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Incomplete Composition                                                                                                                                                                                                                                 | Company is under the suspension | Appointment to the Board and consequently to the committee was made on 15.02.2025 through New Appointment of Directors on the Board and on the Committee as well                                                                                       |                                                                           |  |
| 21 | Integrated Filings (Governance)                                 | Regn 10 of LODR read with SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024 | Non-Compliance for the Quarter Ended 31.12.2024                                                                           | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-Compliance as no Integrated Filings (Governance) was submitted as required under the SEBI Circular dated 31.12.2024                                                                                                                                | Company is under the suspension | Company has not submitted Integrated Filings (Governance) as required under SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024                                                                                                    | Company is under the process of taking the requisite steps in this regard |  |



|    |                                |                                                                                                   |                                                 |                                                                                        |                                                                                  |                                                                                                                         |                                 |                                                                                                                                                     |                                                                           |  |
|----|--------------------------------|---------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--|
| 22 | Integrated Filing (Financials) | Regn 10 of LODR read with SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024 | Non-Compliance for the Quarter Ended 31.12.2024 | BSE (Trading in Securities of the Company are suspended due to various non-compliance) | Trading in Securities of the Company are suspended due to various non-compliance | Non-Compliance as no Integrated Filings (Financials) was submitted as required under the SEBI Circular dated 31.12.2024 | Company is under the suspension | Company has not submitted Integrated Filings (Financials) as required under SEBI Circular No. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024 | Company is under the process of taking the requisite steps in this regard |  |
|----|--------------------------------|---------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|--|

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

| Sl. No | Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports                                                                                                     | Observations made in the Secretarial Compliance report for the year ended 31.03.2024 | 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                                                               |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 1      | Non appointment of Compliance Officer for the Review Period under consideration                                                                                                             | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 6 of LODR                                                                        | Non compliance as no Compliance Officer was appointed                                                                                                   | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 2      | The Compliance Certificate from Share Transfer Agent was submitted on 04.08.2023 after the due date of submission as per the LODR i.e. within 30 days from the end of the year (30.04.2023) | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 7(3) of LODR                                                                     | Delay in submission of the Compliance Certificate on 04.08.2023                                                                                         | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 3      | Delayed submission for the Quarter Ended 31.03.2023 and 30.06.2023. Non-submission for the Quarter Ended 30.09.2023 and 31.12.2023 in the Review Period                                     | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 13(3) of LODR                                                                    | Delayed submission for the Quarter Ended 31.03.2023 and 30.06.2023. Non-submission for the Quarter Ended 30.09.2023 and 31.12.2023 in the Review Period | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 4      | Non-compliance as no payment of Annual Listing Fees is made for the Review Period under Consideration                                                                                       | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 14 of LODR                                                                       | Non-compliance                                                                                                                                          | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 5      | Non-compliance due to non-submission of the Report as required under Regn 23(9) of SEBI LODR for both the half years falling within the Review Period                                       | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 23(9) of LODR                                                                    | Non-compliance                                                                                                                                          | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 6      | Non-compliance due to non-submission of the Report as required under Regn 24A of SEBI LODR                                                                                                  | Trading in Securities of the Company are suspended due to various non-compliance     | Regn 24A of LODR                                                                      | Non-compliance                                                                                                                                          | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |

|    |                                                                                                                                                                                                                 |                                                                                  |                                            |                    |                                                                                                              |                                                                                                                             |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|--------------------------------------------|--------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 7  | Non-compliance due to non-submission of the Report as required under Regn 27 of SEBI LODR for all the quarters falling within the Review Period                                                                 | Trading in Securities of the Company are suspended due to various non-compliance | Regn 27 of the LODR                        | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 8  | Non-compliance due to non-submission of the documents as required under Regn 29(1) of SEBI LODR                                                                                                                 | Trading in Securities of the Company are suspended due to various non-compliance | Regn 29(1) of the LODR                     | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 9  | Non-compliance due to non-submission of the Financial Results as required under Regn 30 read with Schedule III of SEBI LODR                                                                                     | Trading in Securities of the Company are suspended due to various non-compliance | Regn 30 read with Schedule III of the LODR | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 10 | Non-compliance due to non-submission of the Report as required under Regn 31 of SEBI LODR for all the quarters falling within the Review Period                                                                 | Trading in Securities of the Company are suspended due to various non-compliance | Regn 31 of the LODR                        | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 11 | Non-compliance due to non-submission of the Report as required under Regn 33 of SEBI LODR for all the quarters falling within the Review Period                                                                 | Trading in Securities of the Company are suspended due to various non-compliance | Regn 33 of the LODR                        | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 12 | Non-Submission of Annual Report as no AGM was held during the Review Period                                                                                                                                     | Trading in Securities of the Company are suspended due to various non-compliance | Regn 34 of the LODR                        | Non-Compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 13 | Non-compliance due to non-submission of the Report as required under Regn 36 of SEBI LODR                                                                                                                       | Trading in Securities of the Company are suspended due to various non-compliance | Regn 36 of the LODR                        | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 14 | The Compliance Certificate from PCS was submitted on 04.08.2023 after the due date of submission as per the LODR i.e. within 30 days from the end of the year (30.04.2023)                                      | Trading in Securities of the Company are suspended due to various non-compliance | Regn 40 of the LODR                        | Delayed Compliance | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 15 | Non-compliance due to non-submission of the Quarterly Financial Results as required under Regn 33 of SEBI LODR. Therefore, no results was published in the Newspaper as required under Regn 47 of the SEBI LODR | Trading in Securities of the Company are suspended due to various non-compliance | Regn 47 of the LODR                        | Non-compliance     | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |



|    |                                                                                                                                                                                                                                                         |                                                                                  |                                                    |                                                                                                                                                                                                                                              |                                                                                                              |                                                                                                                             |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 16 | Delayed Compliance of Regn 76 for the Quarter Ended 31.03.2023. The Report for the Quarter ended 31.03.2023 was submitted on 04.08.2023. Non-compliance observed for the Quarter Ended 30.06.2023, 30.09.2023 and 31.12.2023 as no Report was submitted | Trading in Securities of the Company are suspended due to various non-compliance | Regn 76 of SEBI (D&P) Regulations, 2018            | Delayed Compliance for the Quarter Ended 31.03.2023. The Report for the Quarter ended 31.03.2023 was submitted on 04.08.2023. Non-compliance observed for the Quarter Ended 30.06.2023, 30.09.2023 and 31.12.2023 as no Report was submitted | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 17 | Non-compliance due to non-submission of the Compliance Certificate as required under Regn 3(5) and 3(6) of SEBI PIT Regulations, 2015 for all the quarters falling within the Review Period                                                             | Trading in Securities of the Company are suspended due to various non-compliance | Regn 3(5) and 3(6) of SEBI (PIT) Regulations, 2015 | Non-compliance                                                                                                                                                                                                                               | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 18 | Tenure of Woman Independent Director expired on 31.01.2024. Hence, the Board did not have Woman Director on its Board from 01.02.2024. Further, the Board does not comprise of 50% of the Independent Directors                                         | Trading in Securities of the Company are suspended due to various non-compliance | Regn 17 of the LODR                                | Non-Compliance                                                                                                                                                                                                                               | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |
| 19 | Incomplete Composition                                                                                                                                                                                                                                  | Trading in Securities of the Company are suspended due to various non-compliance | Regn 19 of the LODR                                | Non-Compliance                                                                                                                                                                                                                               | Company is under the process of taking appropriate steps in order to comply with the regulatory requirements | Company is under the process of taking necessary steps to revoke the suspension by complying with the applicable provisions |

We hereby further report that, during the Review Period the compliance status of the listed entity is appended as below:

| Sl. No. | Particulars                                                                                                                                                                                                                                                                                                                                                           | Compliance Status (Yes/No/NA) | Observations /Remarks by PCS*                                                                                                                                                                                                  |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.      | <b>Secretarial Standards:</b> <ul style="list-style-type: none"> <li>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</li> </ul> | Yes                           | Company is non-compliant and has been suspended from trading on the BSE. However, Company is complying with the requirements of the Companies Act, 2013 read with applicable Rules and Secretarial Standard wherever possible. |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                |                                                                                                                                                                                                                                                                                                                                                      |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. | <b>Adoption and timely updation of the Policies:</b> <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; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>                                     | <p>Yes</p> <p>Yes</p>          | None                                                                                                                                                                                                                                                                                                                                                 |
| 3. | <b>Maintenance and disclosures on Website:</b> <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) are accurate and specific which re-directs to the relevant document(s)/section of the website</li> </ul> | <p>Yes</p> <p>No</p> <p>No</p> | <p>Company is a non-compliant entity. Therefore, if any information or documents are submitted with BSE then only those submitted with BSE are available on the website of the Company.</p> <p>Company has not submitted Annual Corporate Governance Report with BSE. It is under the process of taking necessary steps to comply with the same.</p> |
| 4. | <b>Disqualification of Director:</b> <ul style="list-style-type: none"> <li>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</li> </ul>                                                                                                                                                                                                                    | <p>Yes</p>                     | None                                                                                                                                                                                                                                                                                                                                                 |
| 5. | <b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <ul style="list-style-type: none"> <li>Identification of material subsidiary companies</li> <li>Disclosure requirement of material as well as other subsidiaries</li> </ul>                                                                                                                                                                                  | <p>N.A.</p> <p>N.A.</p>        | None                                                                                                                                                                                                                                                                                                                                                 |
| 6. | <b>Preservation of Documents:</b><br>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.                                                                                                                                                                            | <p>Yes</p>                     | None                                                                                                                                                                                                                                                                                                                                                 |

|     |                                                                                                                                                                                                                                                                                                                                                                    |                 |                                                                                                                                                                                                                                                                       |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.  | <b>Performance Evaluation:</b><br>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.  | <b>Related Party Transactions:</b><br>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.<br>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons alongwith confirmation whether the transactions were subsequently approved/ ratified / rejected by the audit committee. | Yes<br><br>N.A. | None                                                                                                                                                                                                                                                                  |
| 9.  | <b>Disclosure of events or information:</b><br>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.                                                                                                                              | No              | The Company is suspended from trading due to non-compliance with the provisions of the SEBI LODR. It is under the process of taking the requisite steps to comply with all the applicable provisions of the SEBI LODR including Regulation 30 read with Schedule III. |
| 10. | <b>Prohibition of Insider Trading:</b><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.                                                                                                                                                                                                  | No              | Company is suspended from trading in securities and it is under the process of taking necessary steps to comply with the same. Company has procured the SDD Software on 03-01-2025.                                                                                   |
| 11. | <b>Actions taken by SEBI or Stock Exchange(s), if any:</b><br>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in Annexure-A which has been annexed to this Report.                                                                                                          | No              | Trading in the securities of the Company is suspended due to various non-compliances. The Company is under the process of taking positive step to comply with all the applicable provisions.                                                                          |
| 12. | <b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b><br>There was no instance of resignation of Statutory Auditor during the review period.                                                                                                                                                                               | N.A.            | None                                                                                                                                                                                                                                                                  |

|     |                                                                                                                                                                       |    |                                                                                                                                                                                                                                                                                                                                                       |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13. | <b>Additional non-compliances, if any:</b><br><br>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above. | No | <p>1. Non-Compliance as no Integrated Filings (Governance) was submitted as required under the SEBI Circular No.SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024.</p> <p>2. Non-Compliance as no Integrated Filings (Governance) was submitted as required under the SEBI Circular No.SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31.12.2024.</p> |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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: **Not Applicable as no such reportable event during the period under review.**

#### 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 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.

*For Hemant Sharma & Associates*  
*Company Secretaries*

**HEMANT SHARMA** Digitally signed by  
HEMANT SHARMA  
Date: 2025.06.11  
23:40:31 +05'30'

**Hemant Sharma**  
*Proprietor*

*Membership No.: A-42264*  
*COP No.: 17411*

*Date : 11-06-2025*  
*Place: Kolkata*

*Peer Review Certificate No.: 4030 of 2023*  
*UDIN: A042264G000583376*