

ZEAL AQUA LIMITED
CIN No: L05004GJ2009PLC056270



Date: 30/05/2026

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

Scrip ID/ Code : ZEAL/ 539963

Subject : **Annual Secretarial Compliance Report for the Financial Year ended March 31, 2026**

Reference No. : **Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019**

Dear Sir/Madam,

As per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; please find enclosed Annual Secretarial Compliance Report of Zeal Aqua Limited ("the Company") for the Financial Year ended March 31, 2026, issued by Mr. Dhaval P. Master, Partner at M/s. JDM & Associates LLP Practicing Company Secretaries.

Request you to please take the same on your records.

Thanking You,
Yours Faithfully,

For Zeal Aqua Limited

Anita Digbijay Paul
Company Secretary and Compliance Officer

Place: Surat

Regd. Office: Block No. 347, Village: Orma, Taluka: Olpad, District: Surat, State: Gujarat, India
Email: zealaqua@gmail.com, **Website:** www.zealaqua.com **Tel.:** +91 -2621-220047



SECRETARIAL COMPLIANCE REPORT OF ZEAL AQUA LIMITED
CIN: L05004GJ2009PLC056270

FOR THE FINANCIAL YEAR ENDED 31.03.2026

To,
ZEAL AQUA LIMITED
CIN: L05004GJ2009PLC056270
BLOCK NO. 347 VILL. ORMA, TA: OLPAD,
SURAT - 394540, GUJARAT, INDIA

I, **Dhaval P Master**, Designated Partner of **JDM and Associates LLP**, Practising Company Secretary (COP – 13653) having office at 101-B, ZENON, OPP. UNIQUE HOSPITAL, BAMROLI ROAD, SURAT - 395007, GUJARAT, INDIA have examined: -

- (a) all the documents and records made available to us and explanation provided by **ZEAL AQUA 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 financial year ended 31.03.2026 ("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 there-under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there-under and the Regulations, circulars, guidelines issued there-under 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 TO THE COMPANY DURING THE AUDIT REVIEW PERIOD)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



SECRETARIAL COMPLIANCE REPORT / ZAL /2025-26

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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(NOT APPLICABLE TO THE COMPANY DURING THE AUDIT REVIEW PERIOD)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(NOT APPLICABLE TO THE COMPANY DURING THE AUDIT REVIEW PERIOD)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(NOT APPLICABLE TO THE COMPANY DURING THE AUDIT 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;

And circulars/ guidelines issued there-under;

And based on the above examination, I hereby report that during the Review period;

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there-under except in respect of matters specified below:

Refer Annexure – A

- (b) The Listed entity has taken following actions to comply with the observations made in the previous report

Refer Annexure – B

- (c) I hereby report that, during the Review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>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.</p>	Yes	None



2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities ● All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated, as per the regulations/circulars/guidelines issued by SEBI 	Yes	None
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● The Listed entity is maintaining a functional website ● Timely dissemination of the documents/information under a separate section on the website ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website 	No	As per Annexure A attached herewith
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the listed entity is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	None
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:-</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	N.A.	The Company does not have any Subsidiary.
6.	<p>Preservation of Documents:</p> <p>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	None



7.	<p>Performance Evaluation:</p> <p>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.</p>	Yes	None
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(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.</p>	Yes N.A.	None No such related party transaction exists
9.	<p>Disclosure of events or information: -</p> <p>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 there-under.</p>	No	As per Annexure A attached herewith
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	No	As per Annexure A attached herewith
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under except (or)</p>	No	As per Annexure A attached herewith



	The actions taken against the listed entity/its promoters/directors/subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	N.A.	No Such action taken against the listed entity/its promoters/directors /subsidiaries
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries;</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>	No	As per Annexure A attached herewith
13.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	Yes	No additional non-Compliances were observed for any SEBI regulation/ circular/ guidance note etc. during the year under review except mentioned under annexure A attached herewith.

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 SEBI (LODR) Regulations, 2015– Not Applicable

Assumption & 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. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial Records.

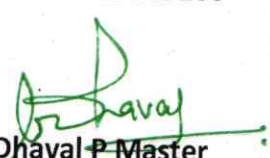


The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the process and practices, we have followed provided a reasonable basis for our opinion.

3. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
4. We have not verified the correctness and appropriateness of financial records and the Books of Accounts of the listed entity.
5. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 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 JDM AND ASSOCIATES LLP
Company Secretaries
Firm Unique No: L2025GJ019100




CS Dhaval P. Master
Designated Partner

Membership No.: A34204

CP No: 13653

Peer Review Certificate No. 6787/2025

ICSI UDIN - A034204H000558959

Place: Surat

Date: 30.05.2026

Annexure - A

Listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there-under except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Compliance Officer and his/her obligations A listed entity shall appoint a qualified Company Secretary	Regulation 6(1) and 6(1A) of the Securities and Exchange Board of India (Listing Obligations and Disclosures)	Compliance Officer is not a Qualified Company Secretary during the period under review, due to resignation of Compliance	BSE Limited	The Company is advised to refer to the SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 issued by Securities and Exchange Board of India (SEBI) with respect to penal actions prescribed for non-compliance of	Delayed in Compliance of Regulation 6(1) and 6(1A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Fine Rs. 36580/- Paid including (Fine- Rs.31000/- + GST – Rs. 5580/-)	The Company should appoint a qualified Company Secretary as the Compliance Officer of the Company as required	Ms. Nishtha Harivanshi Pamnani (M.No.: A58276) Company Secretary in Whole time Employment has resigned from her office w.e.f. 31 st January, 2025	Acknowledged



<p>as the Compliance Officer. Any vacancy in the office of the Compliance Officer shall be filled by the listed entity at the earliest and in any case not later than three months from the date of such vacancy.</p> <p>Other Corporat</p>	<p>Requirements) Regulations, 2015 And Regulation 27(2)(a) of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015</p>	<p>Officer. The Company has not mentioned the penalty imposed on the Company in the Disclosure of Imposition of Fine or Penalty The details of imposition of fine or penalty during the quarter in terms of sub-para 20 of para A of Part A of Schedule III in the Integrated Governance Report for the quarter</p>		<p>certain provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Standard Operating Procedure for suspension and revocation of trading of specified securities of listed entities.</p> <p>Non-compliance with requirement to appoint a qualified company secretary as the compliance officer under Regulation 6(1) of the SEBI (LODR), 2015.</p>	<p>The Listed entity shall fill the casual vacancy at the earliest and not later than three months from the date of such vacancy. However, The Company had appointed a qualified Company Secretary as Compliance Officer w.e.f 01.06.2025. The Company has not mentioned the penalty imposed on the Company in the Disclosure of Imposition of Fine or Penalty The details of</p>		<p>under Reg. 6(1) of SEBI (LODR)Reg., 2015. The Company did not mention the fine imposed by the Stock Exchange in the Integrated Governance Report for the quarter ended 30.09.2025.</p>	<p>who was acting as a Compliance Officer. On her resignation, Mr. Jayan Patel, the CFO of the Company was appointed as a Compliance Officer who is not a qualified Company Secretary. The Company proposed to appoint Ms. Anita Paul (M.No.: F9282), who is a Qualified Company Secretary as a Company Secretary in Whole Time Employment / Compliance Officer in</p>	
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<p>e Governan ce Requirem ents The listed entity shall submit, to the recognize d stock exchange (s), a quarterly complan ce report on corporate governan ce in the format and within the timelines, as may be specified by the Board</p>	<p>dated 30.09.2025</p>		<p>imposition of fine or penalty during the quarter in terms of sub- para 20 of para A of Part A of Schedule III in the Integrated Governance Report for the quarter dated 30.09.2025</p>		<p>compliance with Regulation 6 of the SEBI (LODR) Regulations, 2015. The omission in the Integrated Governance Report was erroneous and the Company takes note of the same.</p>	
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	from time to time.									
2.	Board of Directors The composition of the Board of Directors of the listed entity shall be as follows:- (a) Board of Directors shall have an optimum combination of Executive and Non-Executive Directors with at least one Woman	Regulation 17(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	There is no Chairperson on the Board of Zeal Aqua Limited, however, the strength of the Independent Director throughout the quarter was less than half of the Board, during the filing of Integrated Governance Report for the quarter ended 30.09.2025.	BSE Limited	Observed discrepancies in the Integrated Governance Report filed with the Stock Exchange for the Quarter ended 30.09.2025	It is observed from the Corporate Governance Report filed for the quarter ended September 30, 2025, that as per Regulation 17(1)(b) of SEBI (LODR) Regulations, 2015, there is no Chairperson on the Board of Zeal Aqua Ltd, however, the strength of the Independent Director throughout the quarter was less than half of the Board.	No Fine Imposed	The Company had filed the Integrated Governance Report for the quarter ended 30.09.2025 on 18.10.2025. Subsequently, upon receipt of discrepancy observations from the office of the Stock Exchange, the Company filed a revised Integrated Governance Report on	Due to clerical error, the Chairperson was not selected in the earlier filed Integrated Governance Report. Upon receipt of the said discrepancy from the Stock Exchange, the Company has filed revised Integrated Governance Report for the quarter ended 30.09.2025.	Acknowledged



	Director and not less than 50% of the Board of Directors shall comprise of Non-Executive Directors.							11.11.2025, which was filed after the due date for the filing of the said Report.		
3.	Nomination and Remuneration Committee The Board of Directors shall constitute the Nomination and Remuneration Committee	Regulation 19 and 27(2)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulation	The Company has not formulated the Nomination and Remuneration Committee, as per filed Revised Integrated Governance Report for the quarter ended	N.A.	N.A.	The Company had appointed Mr. Shantilal Ishwarlal Patel (DIN: 01362109), the Executive Director of the Company as the Member of the Nomination and Remuneration Committee of the Company which is in	No Fine Imposed	The Company had appointed Mr. Shantilal Ishwarlal Patel (DIN: 01362109), the Executive Director of the Company as the Member of the	The Company has taken note of the erroneous data and has rectified the same in the filed Integrated Corporate Governance Report for the quarter ended 30.06.2025.	Acknowledged



<p>e as follows: (a) the committee shall comprise of atleast three directors (b) all directors of the committee shall be non-executive directors; and (c) at least two-thirds of the directors shall be independent directors Provided that the Chairpers</p>	<p>ns, 2015</p>	<p>31.03.2025, as prescribed under the SEBI(LODR) Regulations, 2015.</p>			<p>violation of the Regulation 19(1)(b) of the SEBI (LODR) Regulations, 2015.</p>	<p>Nomination and Remuneration Committee of the Company which is in violation of the Regulation 19(1)(b) of the SEBI (LODR) Regulations, 2015.</p>		
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<p>on of the listed entity, whether executive or non-executive may be appointed as a member of the Nominati on and Remuner ation Committe e and shall not chair such Committe e.</p> <p>Other Corporat e Governan ce Requirem ents</p>									
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	The listed entity shall submit, to the recognized stock exchange (s), a quarterly compliance report on corporate governance in the format and within the timelines, as may be specified by the Board from time to time.									
4.	Obligations with respect	Regulation 25(3) of Securities	The Company has not	N.A.	N.A	The Company has not convened a	N.A.	The Company has not	The Company has acknowledged	Acknowledged



<p>to independent directors The independent directors of the listed entity shall hold at least one meeting in a 258[financial] year, without the presence of non-independent directors and members of the management and</p>	<p>and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015</p>	<p>convened a separate Meeting of the Independent Directors without the presence of the Board of Directors and the Members of the Management as per the filed Integrated Governance Report for the quarter ended 31.03.2026</p>			<p>separate Meeting of the Independent Directors without the presence of the Board of Directors and the Members of the Management as per the filed Integrated Governance Report for the quarter ended 31.03.2026</p>		<p>mentioned the Separate meeting of the Independent Directors convened as per Regulation 25(3) of SEBI (LODR) Regulations, 2015 in the Integrated Governance Report for the quarter ended 31.03.2026.</p>	<p>the inadvertent omission and has confirmed that the Separate Meeting was duly convened on 10.02.2026.</p>	
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	all the independent directors shall strive to be present at such meeting.									
5.	<p>Other Corporate Governance Requirements</p> <p>The listed entity shall submit, to the recognized stock exchange (s), a quarterly compliance report on</p>	Regulation 27(2)(a) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has filed Revised Integrated Governance Report with revision of details for the quarter ended 30.06.2025 on 30.07.2025 (within due date)	BSE Limited	Observed discrepancies in the Integrated Governance Report filed with the Stock Exchange for the Quarter ended 30.06.2025	Details of Tenure of Directors were not mentioned and in category of Independent Directors, Non-Executive Non-Independent Directors were selected in Annexure-1 - Com. of BOD of Integrated Governance. Kindly find the attached revised Integrated	No fine imposed	The Company had filed the Integrated Governance Report for the quarter ended 30.06.2025 on 16.07.2025. Subsequently, upon receipt of discrepancy observations from the office of the Stock	There was a clerical error and an inadvertent omission of the Details of Tenure of Directors which was not mentioned in the Report and in the category of Independent Directors, Non-Executive Non-Independent Directors were selected in Annexure-1 -	Acknowledged



	corporate governance in the format and within the timelines, as may be specified by the Board from time to time.					Governance.		Exchange, the Company filed a revised Integrated Governance Report on 30.07.2025.	Committee of BOD of Integrated Governance. Hence, the discrepancies were corrected within the due date of the filling of the Integrated Governance Report for the quarter ended 30.06.2025.	
6.	Other Corporate Governance Requirements The listed entity shall submit, to the recognized stock	Regulation 27(2)(a) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements	The Company has filed Revised Integrated Governance Report with revision of details for the quarter ended 30.09.2025 on 11.11.2025	BSE Limited	Observed discrepancies in the Integrated Governance Report filed with the Stock Exchange for the Quarter ended 30.09.2025	It is observed from the Corporate Governance Report filed for the quarter ended September 30, 2025, that as per Regulation 17(1)(b) of SEBI (LODR) Regulations, 2015, there is	No Fine Imposed	The Company had filed the Integrated Governance Report for the quarter ended 30.09.2025 on 18.10.2025. Subsequently, upon	Due to clerical error, the Chairperson was not selected in the earlier filed Integrated Governance Report. Upon receipt of the said discrepancy from the Stock Exchange, the	Acknowledged



	exchange (s), a quarterly compliance report on corporate governance in the format and within the timelines, as may be specified by the Board from time to time.	ents) Regulations, 2015	(after due date)			no Chairperson on the Board of Zeal Aqua Ltd, however, the strength of the Independent Director throughout the quarter was less than half of the Board.		receipt of discrepancy observations from the office of the Stock Exchange, the Company filed a revised Integrated Governance Report on 11.11.2025, which was filed after the due date for the filing of the said Report.	Company has filed revised Integrated Governance Report for the quarter ended 30.09.2025.	
7.	Other Corporate Governance Requirements The listed entity	Regulation 27(2)(a) of the Securities and Exchange Board of India (Listing	The Company has filed Revised Integrated Governance Report with revision of details for	BSE Limited	Observed discrepancies in the Integrated Corporate Governance Report filed with the Stock Exchange for the Quarter ended 31.03.2026	The Company is resubmitting the Integrated Governance Report to rectify inadvertent errors in Annexure II –	No Fine Imposed	The Company has filed Incorrect Particulars in the Integrated Governance Report for	Due to inadvertence, the Company had mentioned in Annexure II – Annual Affirmation. Certain fields, namely Risk	Acknowledged



	<p>shall submit, to the recognized stock exchange (s), a quarterly compliance report on corporate governance in the format and within the timelines, as may be specified by the Board from time to time.</p>	<p>Obligations and Disclosure Requirements) Regulations, 2015</p>	<p>the quarter ended 31.03.2026 on 29.04.2026 (within due date)</p>			<p>Annual Affirmation. Certain fields, namely Risk Assessment and Management, disclosure of related party transactions on a consolidated basis, and appointment/ removal of Independent Directors through special resolution, were incorrectly marked as "Not Applicable" due to oversight. The same have</p>		<p>the quarter ended 31.03.2026 on 20.04.2026. As per discrepancies observed by the Stock Exchange in the filed Report, The Company has taken due notice of the inadvertent omissions of the same and rectified the said discrepancies in the Revised Integrated Governance Report for the quarter ended</p>	<p>Assessment and Management, disclosure of related party transactions on a consolidated basis, and appointment/ removal of Independent Directors through special resolution, were incorrectly marked as "Not Applicable" due to oversight. The same has been appropriately reviewed and corrected in line with the</p>	
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						now been appropriately reviewed and corrected in line with the applicable provisions of SEBI (LODR) Regulations, 2015. This resubmission is being made to ensure accuracy and completeness of disclosures.		31.03.2026 filed on 29.04.2026.	applicable provisions of SEBI (LODR) Regulations, 2015. The resubmission is being made to ensure accuracy and completeness of disclosures.	
8.	Disclosure of events or information Every listed entity shall make disclosures of any events or informati	Regulation 30(2) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements)	The Company has delayed in the filing of the New Ratings or Revision in Ratings received from CRISIL, a Credit Rating Agency vide letter dated	N.A.	N.A.	The Company has received the Credit Ratings from CRISIL on 22.08.2025, and filed the relevant disclosure with the Stock Exchange on 26.08.2025, which is not within the	N.A.	The Company has delayed in filing of the Disclosure pertaining to Credit Rating received from CRISIL vide letter dated 22.08.2025	The Company has acknowledged the delay in filing the Disclosures under Regulation 30(2) the Company has decided not to continue with the services of CRISIL Ratings	Acknowledged



<p>on which in the opinion of the Board of Directors of the listed company, is material.</p> <p>Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure of such events,</p>	Regulations, 2015	22.08.2025.			<p>stipulated timelines as specified under the SEBI (LODR) Regulations, 2015.</p>		<p>under Regulation 30(2) of the SEBI (LODR) Regulations, 2015 on 26.08.2025.</p>	<p>Limited henceforth. In this regard, the Company has also obtained necessary No Objection Certificates (NOC) from its consortium of banks for discontinuation of the rating mandate with CRISIL.</p>	
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	within 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity									
9.	Disclosure of events or information Every listed entity shall make disclosures of any events or	Regulation 30(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)	The Company has filed revised Disclosure for the intimation dated 26.08.2025 on 29.08.2025 for the Credit	BSE Limited	The Stock Exchange had communicated to the Company for mentioning the Reasons for Delay in making Disclosures as per Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)	The Company has filed the revised disclosure with the Stock Exchange on 29.08.2025 to comply with the Instructions received from the Stock Exchange to	No Fine Imposed	The Company has filed the revised Disclosure and stated the reason for the delay in the filling of the Intimation with the Stock	The Company has acknowledged the delay in filing the Disclosures under Regulation 30(2) as the Company was concurrently addressing an unsolicited	Acknowledged



<p>information in the opinion of the Board of Directors of the listed company, is material.</p> <p>Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure of such</p>	<p>ents) Regulations, 2015</p>	<p>Rating received from CRISIL, a Credit Rating Agency vide letter dated 22.08.2025.</p>		<p>Regulations, 2015.</p>	<p>mention the Reasons for Delay in making Disclosures as per the said Regulation.</p>		<p>Exchange.</p>	<p>rating action taken by CRISIL Ratings, which issued a rating report without any ongoing engagement or consent from the Company. The Company had already decided to discontinue the rating mandate with CRISIL and instead engaged Infomerics as its official credit rating agency. The management took time to carefully consider which rating agency's report should be disclosed to stakeholders.</p>	
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	events, within 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity								This led to the inadvertent delay in making the present disclosure.	
10.	Disclosure of events or information Every listed entity shall make disclosures of any	Regulation 30(2) of Securities and Exchange Board of India (Listing Obligations and Disclosures)	The Company has delayed in the filing of the New Ratings or Revision in Ratings received from Infomeric Valuation	N.A.	N.A.	The Company has received the Credit Ratings from Infomeric Valuation and Rating Limited on 29.07.2025, and filed the relevant disclosure with	N.A.	The Company has delayed in filing of the Disclosure pertaining to Credit Rating received from Infomeric	The Company has acknowledged the delay in filing the Disclosures under Regulation 30(2) the Company has decided not to continue with	Acknowledged



<p>events or information which in the opinion of the Board of Directors of the listed company, is material.</p> <p>Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure</p>	<p>Requirements) Regulations, 2015</p>	<p>and Rating Limited , a Credit Rating Agency vide letter dated 29.07.2025.</p>			<p>the Stock Exchange on 26.08.2025, which is not within the stipulated timelines as specified under the SEBI (LODR) Regulations, 2015.</p>		<p>Valuation and Rating Limited vide letter dated 29.07.2025 under Regulation 30(2) of the SEBI (LODR) Regulations, 2015 on 26.08.2025.</p>	<p>the services of CRISIL Ratings Limited henceforth. In this regard, the Company has also obtained necessary No Objection Certificates (NOC) from its consortium of banks for discontinuation of the rating mandate with CRISIL.</p>	
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	of such events, within 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity									
11.	Disclosure of events or information Every listed entity shall make disclosure	Regulation 30(2) of Securities and Exchange Board of India (Listing Obligations and Disclosures)	The Company has filed revised Disclosure for the intimation dated 26.08.2025 on 29.08.2025	BSE Limited	The Stock Exchange had communicated to the Company for mentioning the Reasons for Delay in making Disclosures as per Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and	The Company has filed the revised disclosure with the Stock Exchange on 29.08.2025 to comply with the Instructions received from	No Fine Imposed	The Company has filed the revised Disclosure and stated the reason for the delay in the filling of the Intimation	The Company has acknowledged the delay in filing the Disclosures under Regulation 30(2) as the Company was concurrently	Acknowledged



<p>s of any events or information which in the opinion of the Board of Directors of the listed company, is material. Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make disclosure</p>	<p>e Requirements) Regulations, 2015</p>	<p>for the Credit Rating received from Infomeric Valuation and Rating Limited, a Credit Rating Agency vide letter dated 29.07.2025.</p>		<p>Disclosure Requirements) Regulations, 2015.</p>	<p>the Stock Exchange to mention the Reasons for Delay in making Disclosures as per the said Regulation.</p>		<p>with the Stock Exchange.</p>	<p>addressing an unsolicited rating action taken by CRISIL Ratings, which issued a rating report without any ongoing engagement or consent from the Company. The Company had already decided to discontinue the rating mandate with CRISIL and instead engaged Infomeric as its official credit rating agency. The management took time to carefully consider which rating</p>	
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	of such events, within 24 hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity								agency's report should be disclosed to stakeholders. This led to the inadvertent delay in making the present disclosure.	
12.	Disclosure of events or information Every listed entity shall make disclosure	Regulation 30(2) of Securities and Exchange Board of India (Listing Obligations and Disclosures)	The Company has delayed in the filing of the Intimation to the Stock Exchange under Regulation 30(2) of the	N.A.	N.A.	The Company has delayed in filing the intimation to the Stock Exchange under Regulation 30(2) of the SEBI (LODR) Regulations,	N.A	The Company has not submitted the resignation of the Compliance Officer with the Stock Exchange	The delay in submission of the resignation letter within the stipulated timeline of 7 days from the effective date was due to inadvertent oversight and	Acknowledged



<p>s of any events or information which in the opinion of the Board of Directors of the listed company, is material.</p> <p>Events specified in Para A of Part A of Schedule III are deemed to be material events and listed entity shall make</p>	<p>e Requirements) Regulations, 2015</p>	<p>Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements, 2015 and Para A of Part A of Schedule III</p>			<p>2015, pertaining to the Resignation of Mr. Jayan Rajeshkumar Patel, as the Compliance Officer of the Company, within 7 days from the effective date of resignation.</p>		<p>within the prescribed timeline as mentioned in Regulation 30(2) of the SEBI (LODR) Regulations, 2015 and Para A of Part A of Schedule III.</p>	<p>internal administrative reasons. The Company regrets the delay and assures that necessary steps are being taken to ensure timely compliance in the future.</p>	
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<p>disclosure of such events, Resignation of Compliance Officer, the letter of resignation along with detailed reasons for resignation as given by the Compliance Officer shall be disclosed to the Stock Exchange by the listed entities within</p>									
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	seven days from the date that such resignation comes into effect.									
13.	<p>Holding of Specified Securities and Shareholding Pattern</p> <p>The listed entity shall submit to the stock exchange (s) a statement showing holding of securities and shareholding</p>	Regulation 31(1)(b) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	The Company has filed Revised Shareholding Pattern with revision of details for the quarter ended 31.12.2025 on 10.02.2026 (after due date)	BSE Limited	Observed discrepancies in the Shareholding Pattern filed with the Stock Exchange for the Quarter ended 31.12.2025	<p>The Exchange has observed the following discrepancies in the XBRL filing</p> <p>Discrepancies:</p> <p>Discrepancy: 1. PAN of NIRU PATEL is ZZZZZ9999Z which is not valid.</p> <p>2. PAN of RAMA PATEL is ZZZZZ9999Z which is not valid.</p> <p>3. PAN of RAMI PATEL is ZZZZZ9999Z</p>	No Fine Imposed	It was observed that the Company has filed Revised Shareholding Pattern for the Quarter ended 31.12.2025 on 10.02.2026, which was after the prescribed timeline under Regulation 31(1)(b) of SEBI (LODR)	The Company has rectified the discrepancies raised by the Stock Exchange and had filed Revised Shareholding pattern to correct the PAN of the Shareholders mentioned being invalid.	Acknowledged



	<p>pattern separately for each class of securities, in the format specified by the Board from time to time within the following timelines:</p> <p>(b) on a quarterly basis, within twenty-one days from the end of each quarter</p>					<p>which is not valid.</p> <p>4. PAN of USHA PATEL is ZZZZZ9999Z which is not valid.</p> <p>5. PAN of DHARMEN BHAGWAKAR is ZZZZZ9999Z which is not valid.</p>		Regulations, 2015.		
14.	Financial Results The listed	Regulation 33(3)(a) of	The Company has filed	N.A.	N.A.	The Company has filed Revised	No Fine Impose	The Company has filed	The Company has filed Revised	Acknowledged



<p>entity shall submit the financial results in the following manner (a) the listed entity shall submit quarterly and year-to-date standalone financial results to the Stock Exchange within forty-five (45) days of end of each quarter, other</p>	<p>Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015</p>	<p>Revised Financial Results with revision of details for the quarter and year ended 31.03.2025 on 25.06.2025 (after due date)</p>			<p>Financial Results with revision of details for the quarter and year ended 31.03.2025 on 25.06.2025, which is beyond the stipulated timeline under the Regulation 33(3)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</p>	<p>d</p>	<p>Revised Financial Results with revision of details for the quarter and year ended 31.03.2025 on 25.06.2025, which is beyond the stipulated timeline under the Regulation 33(3)(a) of SEBI (LODR), Regulations, 2015.</p>	<p>Financial Results due to an inadvertent technical error occurred in SAP/Tally, certain discrepancies observed in figures of Revenue from operations and Changes in inventories of finished goods, work-in-progress and stock-in-trade in the financial statements submitted earlier for the quarter and year ended March 31, 2025. The Revenue from operations, as</p>	
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	than the last quarter								<p>corrected, should read as under:</p> <p>1. In the Standalone Audited Financial statements, Item no.1 of "Income- Revenue from operations for the quarter and year ended March 31, 2025" was Omitted with a Figure of Goods in Transit (Goods Sold) which after inclusion should be Rs. 51,132.023 lakhs instead of Rs.50,568.578 lakhs. Please</p>	
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									<p>note that the total Net Profit however remains unchanged.</p> <p>2. The Total income from the operations shown in the Standalone Audited Financial statements for the quarter and year ended March 31, 2025 should be Rs. 52,100.522 lakhs instead of Rs. 51,537.077 lakhs.</p> <p>The Changes in inventories of finished goods, work-in-progress and stock:in-trade,</p>
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									<p>as corrected, should read as under:</p> <p>1. In the Standalone Audited Financial statements, Item no.2 of "Expenses- Changes in inventories of finished goods, work-in-progress and stock-in-trade for the quarter and year ended March 31, 2025" should be Rs. (1246.365) lakhs instead of Rs. (1809.810) lakhs.</p> <p>We further state that there is no</p>
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									<p>change in the Net Profit before exceptional items and tax, Net Profit after tax and Total Comprehensive Income for the quarter and year ended March 31, 2025.</p> <p>Upon discovery, we have taken immediate corrective measures and have prepared the revised financial statements reflecting accurate and complete information.</p>
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15.	<p>Website The listed entity shall maintain a functional website containing the basic information about the listed entity.</p> <p>The listed entity shall disseminate the following information under a separate section on its website.</p>	Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015	The website of the Company is not disseminating or updating various matters as specified under Regulation 46(2) & 46(3) of SEBI (LODR) Regulation, 2015.	N.A.	N.A.	The Company has not been maintaining their website and has not been disseminating or updating various matters as specified under the Regulation 46(2) & 46(3) of SEBI (LODR) Regulation, 2015.	N.A.	It is observed that the Website of the Company was not disseminating or updating various matters as specified under Regulation 46(2) & 46(3) of SEBI (LODR) Regulation, 2015	The Company has acknowledged the fact and has initiated the procedure for the updating of the Company's Website.	Acknowledged
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	The listed entity shall ensure that the contents of the website. The listed entity shall update any change in the content of its website within two working days from the date of such change in content.									
16.	Communication or procurement of	Regulation 3(5) of the Securities	Non Compliance of Regulation	N.A.	N.A.	Non Compliance of Regulation 3(5) of the	N.A.	The Company has not complied	The Company was unable to enter the data within the	Acknowledged



<p>unpublish ed price sensitive informati on</p> <p>Regulatio n 3(5)- The Board of directors or head(s) of the organizati on of every person required to handle unpublish ed price sensitive informati on shall ensure that a Structure d Digital</p>	<p>and Exchange Board of India (Prohibiti on of Insider Trading) Regulatio ns, 2015</p>	<p>3(5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Listed entity has not been updating the SDD since the period from 01.07.2025 to 31.03.2026, within the prescribed timeline</p>			<p>Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Listed entity has not been updating the SDD since the period from 01.07.2025 to 31.03.2026, within the prescribed timeline</p>		<p>with the Regulation 3(5) of the SEBI(PIT) Regulations, 2015 as they have not entered the data in the SDD within 2 calendar days from the receipt of such information</p>	<p>stipulated timeline in the Structured Digital Database due to the inadvertent oversight and internal administrative reasons.</p>	
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<p>Database is maintained containing the nature of Unpublished Price Sensitive Information and the names of such persons who have shared the information and also the names of such persons with whom information is shared</p>									
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<p>under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained</p>									
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<p>internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.</p> <p>Provided that entry of information, not emanating from within the organisation, in structure</p>									
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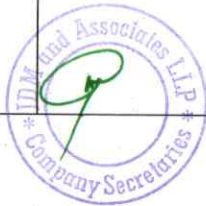
	d digital database may be done not later than 2 calendar days from the receipt of such information									
17.	CHAPTER V: Event-Based Disclosures SECTION V-D: Resignation of Statutory Auditors from Listed Entities and their Material	CHAPTER V: Event-Based Disclosures SECTION V-D and paragraph 6.1 of Master Circular for compliance with the provisions	The Company has not complied with the paragraph 6.1 of Section V-D of Chapter V of the Master Circular on Compliance with the provisions of the LODR	N.A.	N.A.	M/s. Patel Kabrawala and Co.(FRN: 130952W), Chartered Accountants have tendered their resignation vide letter dated 04.09.2025, and the Company had appointed M/s. D C	No Fine Imposed	The Company has not complied with the paragraph 6.1 of Section V-D of Chapter V of the Master Circular on Compliance with the provisions of the LODR	The Company has acknowledged the resignation submitted by the Statutory Auditor, M/s. Patel Kabrawala and Co.(FRN: 130952W), Chartered Accountants. However, the Company was not in the	Acknowledged



<p>Subsidiaries</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 of</p>	<p>of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 by listed entities issued by SEBI</p>	<p>Regulations by listed entities.</p>			<p>JARIWALA & CO, (FRN: 104063W), Chartered Accountants in their Board Meeting dated 05.09.2025, and has not complied with the paragraph 6.1 of Section V-D of Chapter V of the Master Circular issued by SEBI.</p>		<p>Regulations by listed entities.</p>	<p>position to submit and file the necessary Limited Review Report of the quarter ended 30.09.2025, as the Company had already appointed M/s. D C JARIWALA & CO, (FRN: 104063W), Chartered Accountants, as the Statutory Auditors of the Company.</p>	
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<p>Section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>									
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Annexure - B

Listed entity has taken following actions to comply with the observations made in the previous report

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in previous report	Observation made in the secretarial compliance report for the year ended 31.03.2025	Compliance requirement (Regulations/Circulars/Guidelines including specific clause)	Details of Violation / deviations and Actions taken/Penalty impose, if any, on the listed entity	Remedial Action, if any, taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Company should appoint a qualified Company Secretary as the compliance officer of the Company as required under Regulation 6(1) of SEBI (LODR) Regulations, 2015.	Company should appoint a qualified Company Secretary as the compliance officer of the Company as required under Regulation 6(1) of SEBI (LODR) Regulation, 2015.	Regulation 6(1) A listed entity shall appoint a qualified company secretary as the compliance officer.	Compliance officer is not a qualified Company Secretary as on 31.03.2025 as required under Regulation 6(1) of SEBI (LODR) Regulation, 2015.	The Company has appointed Ms. Anita Paul (M.No.:F9282) as Company Secretary in Whole time Employment / Compliance Officer w.e.f 01.06.2025 in compliance with Regulation 6 of the SEBI (LODR) Regulations, 2015	Acknowledged
2.	Delayed in payment of Annual Fees The listed entity has paid annual fees for the F.Y. 2023-24 of the	Delayed in payment of Annual Fees	Fees and other charges to be paid to the recognized stock exchanges(s). The listed entity shall pay all such fees or charges, as applicable, to	Delayed in the Compliance of Regulation 14 of Securities and Exchange Board of India (Listing	The interest amount of Rs.3,835/- for the period 01-May-2024 TO 31-May-2024 levied vide Invoice No.25270500077923	Acknowledged



	<p>BSE (Bombay Stock Exchange) on 16.05.2024.</p> <p>The Interest amount of Rs.3,835/- levied by the BSE Ltd. has been paid by the Company on 29.05.2025.</p>	<p>The listed entity has paid annual fees for the F.Y. 2023-24 of the BSE (Bombay Stock Exchange) on 16.05.2024.</p> <p>The Interest amount of Rs.3,835/- levied by the BSE Ltd. has been paid by the Company on 29.05.2025.</p>	<p>the recognized stock exchange(s), in the manner specified by the Board or the recognized stock exchange(s).</p>	<p>Obligations and Disclosure Requirements) Regulations, 2015</p> <p>The Listed entity shall pay annual fees on or before 30th April every year.</p> <p>However, The Company has paid annual fees for F.Y.2023-24 of BSE on 16.05.2024. The Interest amount of Rs.3,835/- levied by the BSE Ltd. has been paid by the Company on 29.05.2025.</p>	<p>dated 28-03-2025 levied by the BSE Ltd. has been paid by the Company on 29.05.2025.</p>	
3.	<p>Company should re-appoint/appoint MD / WTD within 3 months of expiry of term as per Regulation 17(1E) of SEBI (LODR) Regulation, 2015.</p>	<p>Company should re-appoint/appoint MD / WTD within 3 months of expiry of term as per Regulation 17(1E) of SEBI</p>	<p>Board of Directors</p> <p>17 (1E) Any vacancy in the office of a director shall be filled by the listed entity at the earliest and in any case not later than three months from the date of such vacancy:</p>	<p>Vacancies in the offices of Managing Director and Whole Time Director(s) have not been filled up till the date of this</p>	<p>The Company has acknowledged the fact and appointed MD/WTD and filled the vacancy within the 3 months as per Regulations.</p>	Acknowledged



		(LODR) Regulation, 2015.		report.		
4.	Company should re-appoint/appoint MD / WTD within 3 months of expiry of term as per Reg. 17(1E) of SEBI (LODR) Regulation, 2015.	Company should re-appoint/appoint MD / WTD within 3 months of expiry of term as per Reg. 17(1E) of SEBI (LODR) Regulation, 2015.	26A(1) Any vacancy in the office of Chief Executive Officer, Managing Director, Whole Time Director or Manager shall be filled by the listed entity at the earliest and in any case not later than three months from the date of such vacancy:	Vacancies in the offices of Managing Director and Whole Time Director(s) have not been filled up till the date of this report.	The Company has acknowledged the fact and appointed MD/WTD and filled the vacancy within the 3 months as per Regulations.	Acknowledged
5.	Delay in filing of revised Integrated Governance Report for the quarter ended on 31.03.2025	Delay in filing of revised Integrated Governance Report for the quarter ended on 31.03.2025	27(2) (a) The listed entity shall submit, to the stock exchange(s), a quarterly compliance report on corporate governance in the format and within the timelines, as may be specified by the Board from time to time.	Delay in filing of Integrated Governance Report with revision of details for quarter ended on 31.03.2025	The Company, on the notice of the error, to rectify the same, Integrated Governance Report with revision of details was filed beyond time-limit.	Acknowledged
6.	The Company failed to comply with the minimum prior intimation requirement as prescribed under Regulation 29(1) of the SEBI (LODR) Regulations, 2015.	The Company failed to comply with the minimum prior intimation requirement as prescribed under Regulation 29(1) of the SEBI (LODR)	29(1) The listed entity shall give prior intimation of at least two working days in advance, excluding the date of the intimation and date of the meeting to stock exchange about the meeting of the board of directors in which financial results	The Company has not complied with the minimum prior intimation requirement as prescribed under Regulation 29(1) of the SEBI (LODR) Regulations,	The Company has acknowledged the fact and paid the penalty imposed by the Stock Exchange on 21st March 2025.	Acknowledged



	Accordingly. The BSE Ltd imposed a fine as per SEBI Master Circular dated 11.11.2024.	Regulations, 2015. Accordingly. The BSE Ltd imposed a fine as per SEBI Master Circular dated 11.11.2024.	is due to be considered.	2015. The Board Meeting held on 4th February 2025 for consideration of financial results for the quarter and nine months ended 31.12.2024. About the same, the company has intimated to the stock exchange on 1st February 2025, which did not satisfy the minimum requirement of two clear working days' notice (excluding the date of intimation and date of meeting).		
7.	It is observed that the web-site of the Company was not disseminating or	It is observed that the web-site of the Company was not disseminating	Regulation 46 (1) The listed entity shall maintain a functional website	It is observed that the web-site of the Company was not disseminating	The Company has acknowledged the fact and initiated for the update of Web-	Acknowledged



	update some of the matters as specified under Regulation 46(2) & 46(3) of SEBI (LODR) Regulation,2015	or update some of the matters as specified under Regulation 46(2) & 46(3) of SEBI (LODR) Regulation,2015	<p>containing the basic information about the listed entity.</p> <p>(2) The listed entity shall disseminate the information as mentioned in this sub-regulation under a separate section on its website.</p> <p>(3) (a) The listed entity shall ensure that the contents of the website are correct.</p> <p>(b) The listed entity shall update any change in the content of its website within two working days from the date of such change in content.</p>	or update some of the matters as specified under Regulation 46(2) & 46(3) of SEBI (LODR) Regulation,2015.	Site.	
8.	The Company has not provided the complete data maintained under structured digital database (SDD) software; hence we are unable to comments whether Company has complied the provisions of Regulation 3(5) and 3(6) of SEBI	The Company has not provided the complete data maintained under structured digital database (SDD) software; hence we are unable to comments whether Company has complied the	<p>Restrictions on communication and trading by Insiders</p> <p>Regulation 3(5)- The Board of directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that a Structured Digital Database is maintained containing the nature of Unpublished Price Sensitive</p>	Non-Compliance of Regulation 3(5) and 3(6) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Listed entity has not	The Company has retrieved the SDD Software and made the previous entries in the SDD Software as per the Regulation.	Acknowledged



<p>(Prohibition of Insider Trading) Regulations, 2015 OR not.</p>	<p>provisions of Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015 OR not.</p>	<p>Information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as timestamping and audit trails to ensure non-tampering of the database.</p> <p>Regulation 3(6)- The Board of Directors or Head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the</p>	<p>maintained SDD Data Base with adequate internal controls, timestamping, and audit trails during the Reporting period as per requirements of Reg. 3(5) AND Non-Preservation of structured digital database (SDD) software as required under Reg. 3(6) The Company has not provided the report from the SDD software.</p>		
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			relevant information in the structured digital database shall be preserved till the completion of such proceedings.			
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For JDM AND ASSOCIATES LLP
Company Secretaries
Firm Unique No: L2025GJ019100


CS Dhaval P Master
Designated Partner

Membership No.: A34204
CP No: 13653

Peer Review Certificate No. 6787/2025
ICSI UDIN - A034204H000558959



Place: Surat
Date: 30.05.2026