



May 30, 2024

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

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

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

Dear Sir(s),

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2021 and pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclose herewith Secretarial Compliance Report duly issued by Yogesh K & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2024.

Kindly take the above information on your record and oblige.

Thanking you.

FOR SHIVAM AUTOTECH LIMITED



SHAKTI MAHANA
COMPANY SECRETARY
M.NO. A69273

SHIVAM AUTOTECH LIMITED www.shivamautotech.com
CIN: L34300HR2005PLC081531

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

Tel: 0124-4698700
Fax: 0124-4698798

Yogesh K & Associates

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF SHIVAM AUTOTECH LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024

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

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Shivam Autotech Limited (hereinafter referred as “the listed entity”), having its registered office 10, 1st Floor, Tower A, Emaar Digital Greens, Sector - 61, Golf Course Extension Road, Gurugram, Haryana, India, 122102. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity’s books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

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

- a) all the documents and records made available to us and explanation provided by the listed entity,
- b) the filings/ submissions made by the listed entity to the Stock Exchanges,
- c) website of the listed entity,
- d) any other document/filing, as may be relevant, which has been relied upon to make this certification,

Address-10/58, basement, Vikram Vihar, Lajpat Nagar-IV, Delhi-110024
Email-ypaandcompany@gmail.com, Cont-9315259390

“Speak the Truth, Abide by the Law”

for the financial year ended on March 31, 2024 (“Review Period”) in respect of compliance with the provisions of:

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

The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include: -

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as “SEBI(LODR), 2015/ Listing Regulations”);
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (hereinafter referred as “SEBI(LODR), 2015);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not Applicable to the listed entity during the Review Period**) ;
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**Not Applicable to the listed entity during the Review Period**);
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (**Not Applicable to the listed entity during the Review Period**);
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred as “SEBI (PIT) Regulation, 2015”);
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (hereinafter referred as “SEBI (DP) Regulations, 2028”) (applicable to the Company to the extent of Compliance of Regulation 76)

and circulars/ guidelines issued thereunder. and based on the above examination, we hereby report that, during the review period:

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

Sr. No.	Compliance Requirement (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
Please refer annexure-1 (page no. 1 to 3)										

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
Please refer below										

1. The Company has represented that it is maintaining non-tempered Structured Digital Database of all unpublished price sensitive information (UPSI) in terms Regulation 3(5) of The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 internally having adequate internal controls and checks. On the basis of details provided by the Company, we have observed that details of one UPSI has been maintained in Structured Digital Database software w.e.f. 18.1.2023 whereas there were total four UPSI during Financial year 2022-23.

Management Response last reporting period:

Due to administrative process, Company has purchased the software in third quarter and captured the UPSI details from October onwards. However, meeting of the Board of Directors was held on 22nd October, 2022 so were able to record the UPSI from fourth quarter onwards only. Prior to that period the company was maintaining the details internally in physical form.

Management Response current reporting period:

The listed entity is maintaining non-tempered Structured Digital Database of all unpublished price sensitive information (UPSI) in terms Regulation 3(5) of The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 internally having adequate internal controls and checks.

2. The Transcript of post-results Investor call held on 10.8.2022 have not been intimated to the Stock Exchanges and also not hosted on website of the Company as required under Regulation 30 read with Regulation 46 of the Listing Regulations.

Management Response last reporting period:

The call was arranged by investor's side only and the Company was not able to get recording and transcripts of the same from their side. Due to non-availability of the information and inadvertently, post call compliances of the investor meet could not be uploaded with the Stock Exchanges and website of the Company as well.

Management Response current reporting period:

As already clarify earlier in last reporting period.

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the	NA	No such event during the review period

	limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.		
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the Listed entity, the auditor has informed the Audit Committee the details of information/explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in Its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	No such event during the review period

3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such event during the review period

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

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

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118 (10) of the Companies Act, 2013 and mandatorily applicable.</p>	Yes	-
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of Board of Directors/ Committees of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/ circulars/guidelines issued by SEBI. 	Yes	-

3.	<p><u>Maintenance and disclosures on Website:</u></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) of Listing Regulations are accurate and specific which redirects to the relevant document(s)/section of the website. 	<p>Followings has not been updated:</p> <ol style="list-style-type: none"> 1. Annual return (MGT-9) was not available for the period under review. 2. Revision in credit rating was updated, last updated on September 26, 2022. 3. Disclosure under regulation 30 of listing SEBI (LODR), 2015. 	<p>Followings has not been updated:</p> <ol style="list-style-type: none"> 1. Annual return (MGT-9), 2. Revision in credit rating, 3. Disclosure under regulation 30 of listing regulations.
4.	<p><u>**Disqualification of Director:</u></p> <p>None of the Directors of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	-
5.	<p><u>Details related to Subsidiaries of listed entity have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary companies. (b) Disclosure requirements of material as well as other subsidiaries.</p>	(a) NA (b) NA	The listed entity does not have any subsidiary and material subsidiary.
6.	<p><u>Preservation of Documents:</u></p> <p>As per the confirmations given by the listed entity, and on our test check basis, listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records is as per Policy of Preservation of Documents and Archival policy</p>	Yes	-

	prescribed under Listing Regulations.		
7.	<p><u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees on an annual basis as prescribed in SEBI Regulations.</p>	Yes	-
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.</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>	<p>a) Yes</p> <p>b) Yes</p>	<p>a) -</p> <p>b) -</p>
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of Listing Regulations within the time limits prescribed thereunder.</p>	<p>As per regulation 30 (6) read with para A of part A of Schedule III of SEBI (LODR), 2015 , Action taken by stock exchanges need to disclosure to stock exchanges.</p> <p>Further as per information provide to us, stock exchanges has imposed fine for followings (more details of which are part of annexure -1 of this secretarial compliance report).</p> <p>1. Composition of Board,</p>	<p>As per regulation 30 (6) read with para A of part A of Schedule III of SEBI (LODR), 2015 , Action taken by stock exchanges need to disclosure to stock exchanges.</p> <p>Further as per information provide to us, stock exchanges has imposed fine for followings (more details of which are part of annexure -1 of this secretarial compliance report).</p> <p>1. Composition of Board,</p>

		<p>2. Late intimation of related party disclosure for half yearly ended on 39th of September, 2023.</p> <p>3. Action taken in relation to not obtaining in-principle approval,</p> <p>4. Delay in prior intimation of board meeting held on 2nd of July, 2023.</p>	<p>2. Late intimation of related party disclosure for half yearly ended on 39th of September, 2023.</p> <p>3. Action taken in relation to not obtaining in-principle approval,</p> <p>4. Delay in prior intimation of board meeting held on 2nd of July, 2023.</p>
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3 (5) & 3 (6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	-
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No Actions have been taken against the listed entity/ its promoters/directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.</p>	<p>Following actions has been taken by stock exchanges:</p> <p>1. Imposition of fine due to the listed entity did not have Composition of board of Board of Directors as required under regulation 17 of SEBI (LODR), 2015 during the period starting from 28th of April, 2023 till 2nd of July, 2023.</p> <p>2. Imposition of fine due to late intimation of related party transactions as required under</p>	<p>Following actions has been taken by stock exchanges:</p> <p>1. Imposition of fine due to the listed entity did not have Composition of board of Board of Directors as required under regulation 17 of SEBI (LODR), 2015 during the period starting from 28th of April, 2023 till 2nd of July, 2023.</p> <p>2. Imposition of fine due to late intimation of related party transactions as required under</p>

		<p>regulation 23 (9) of SEBI (LODR), 2015.</p> <p>3. Imposition of fine due to delay in prior intimation of Board meeting held on 2nd July, 2023.</p> <p>4. Remains to be obtained In-principle approval in relation private placement of optionally convertible debentures issued in second quarter of financial year 2023-24. Further NSE imposed penalty of Rs. 59,000, penalty not paid till time.</p>	<p>regulation 23 (9) of SEBI (LODR), 2015.</p> <p>3. Imposition of fine due to delay in prior intimation of Board meeting held on 2nd July, 2023.</p> <p>4. Remains to be obtained In-principle approval in relation private placement of optionally convertible debentures issued in second quarter of financial year 2023-24. Further NSE imposed penalty of Rs. 59,000, penalty not paid till time.</p>
12.	<p><u>Additional non-compliances, if any:</u></p> <p>To the best of our knowledge, no additional non-compliance observed for any SEBI regulation/circular/guidance note, etc.</p>	NA	

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

**** Except, Mr. Bhagwan Das Narang, Din- 00826573 (Chairman & Independent Director) and Mrs. Jyothi Prasad, Din- 06947488 (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD -SEC-4-26042/2023-24 dated 28th April, 2023. Both ceased to act as director with effect from 28th of April, 2023. However intimation for their cessation was originally given on 9th May, 2023. Further as per our understanding intimation should be given with in specified as per regulation 30 (6) read with para A part A of Schedule II of Listing regulations.**

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.

2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: New Delhi

Date: 30/05/2024

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

Yogesh
Kumar

Digitally signed
by Yogesh
Kumar
Date: 2024.05.30
22:36:01 +05'30'

CS Yogesh Kumar

Proprietor

M. No. A60866

C.P. No. 23576

PR 4659/2023

UDIN: A060866F000503101

ANNEXURE-1

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

2	<p>COMPOSITION OF NOMINATION AND REMUNERATION COMMITTEE (NRC):</p> <p>During the period starting from 28th April, 2023, due to cessation of office of Mr. Bhagwan Dass Narang (Chairman & Independent Director) and Mrs. Jyothi Prasad (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD -SEC-4-26042/2023-24 dated 28th April, 2023. Following were the members of Nomination and remuneration Committee namely 1. Mr. Sunil Chinubhai Vakil and 2. Dr. Anil Kumar Gupta.</p> <p>As per requirement of Regulation 19 of SEBI (LODR), 2015, the Committee shall comprised at least three directors and all directors of the Committee shall be non-executive directors out of them at least two third (2/3) shall be independent directors.</p> <p>Further as per minutes of the Nomination and remuneration committee meeting held on 25th of May, 2023 there were two members as members of Committee Namely 1. Mr. Sunil Chinubhai Vakil as Chairperson and Dr. Anil Kumar Gupta being Non-Executive Director as on date as member.</p> <p>In Board meeting held on 25th of May, 2023, Mr. Yogesh Chander Munjal was appointed as new member of nomination and remuneration committee and designation of Dr. Anil Kumar Gupta was changed from non- executive to non-executive and independent director. So after new appointed and change in designation there were three members in Committee namely 1. Mr. Sunil Chinubhai Vakil as Chairperson, Dr. Anil Kumar Guptaas member and Mr. Yogesh Chander Munjal as member.</p>	Regulation 19 of SEBI (LODR), 2015.	Composition of board was not as per requirements of provisions of Regulation 19 of SEBI(LODR), 2015 readwith other provisions of SEBI (LODR), 2015	-	-	-	-	<p>Mr. Bhagwan Dass Narang (Chairman & Independent Director) and Mrs. Jyothi Prasad (Independent Director) of the Company ceased to be Directors on the Board pursuant to SEBI Order WTH/SM/MIRSD/MIRSD -SEC-4- 26042/2023-24 dated 28th April, 2023.</p> <p>The Composition of Nomination and Remuneration Committee was not as per law from 28th April, 2023 till 25th of May, 2023.</p> <p>Mr. Yogesh Chander Munjal was appointed as new member of nomination and remuneration committee on 25th of May, 2023.</p>	<p>As per Reg.17 (1E) of SEBI (LODR),2015 Any casual vacancy in the office of a director shall be filled by the company at the earliest and in any case not later than three months from the date such vacancy.</p> <p>The Company has complied with the same within three months. Further with reference to the fine imposed by the stock exchange, the same has been paid by the company.</p>	<p>Due to Cessation of office of Mr. Bhagwan Das and Ms. Jyothi Prasad, The Board fails to comply the requirement of composition.</p> <p>Further the Listed entity was in compliances of the requirement of regulation 19 of SEBI(LODR), 2015 after the Board meeting held on 25th of May, 2023.</p>
3	<p>RECONCILIATION OF SHARE CAPITAL AUDIT REPORT:</p> <p>Reconciliation of Share Capital Audit Report for quarter ended 30th September, 2023 was filed on 1st of November, 2023. The last date of intimation was 30th October, 2023.</p>	76 of SEBI (DP) Regulations, 2028	delay	-	-	-	-	<p><i>Reconciliation of Share Capital Audit Report for quarter ended 30th September, 2023 was filed on 1st of November, 2023. The last date of intimation was 30th October, 2023.</i></p>	<p>Due to technical issues encountered the Company has filled the Reconciliation of share capital Audit with stock exchanges lately.</p>	1 day delay in intimation
4	<p>DISCLOSURE OF RELATED PARTY TRANSACTIONS(RPTs):</p> <p>As per Regulation 23 (9) of SEBI (LODR), 2015, the Company is required to disclosed RPTs on in every 6 Months basis within 24 hours from closure of board meeting in which financial were approved.</p> <p>The Company has approved the half yearly financial statement on 9th of November, 2023. disclosure should be given in 24 hours (ie on or before 5:30 on 10th November, 2023) from 9th November, 2023 Board Meeting.</p> <p>Intimation was given on 15th of November, 2023.</p>	Regulation 23 (9) of SEBI (LODR), 2015	late Intimation to Stock Exchanges	1. BSE and 2. NSE	Cost imposed (ie.Fine).	Late intimation	BSE-Rs. 35,400/- (Rupees Thirty Five Thousand Four Hundred Only/-) NSE-Rs. 35,400/- (Rupees Thirty Five Thousand Four Hundred Only/-)	<p><i>The Company has approved the half yearly financial statement on 9th of November, 2023. disclosure should be given in 24 hours (ie on or before 5:30 on 10th November, 2023) from 9th November, 2023 Board Meeting.</i></p>	<p>Reference to this fine imposed by stock exchange paid by the company.</p>	Intimation was given on 15th of November, 2023.

5	<p>IN-PRINCIPLE APPROVAL UNDER REGULATION 28 (1) OF SEBI (LODR) REGULATIONS, 2015 READ WITH REGULATION 163 OF SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018</p> <p>The Company has issued optionally convertible debentures on a private placement basis during the period under review, in principle approval from stock exchanges remains to be obtained.</p> <p>The listed entity although applied for in-principle approval to BSE and NSE but both the stock exchanges asked for details of details of identity of the natural persons who are the ultimate beneficial owners of the shares proposed to be allotted and/or who ultimately control the proposed allottees. the entity did not provide the requisite information to both the stock exchanges.</p> <p>NSE has rejected the application.</p>	Regulation 28 of SEBI (LODR), 2015.	In-principle approval from BSE and NSE remains to be obtained.	Application rejected by NSE and fine imposed	Fine	In-principle approval	NSE-59000 BSE-0.00	In-principle approval remains to be obtained.	<p>The company has filled the application timely with stock exchanges for taking In principle approval, but as company was unable to clarify observations.</p> <p>The company resolving the same at earliest</p>	In-principle approval remains to be obtained
6	<p>CLOSURE OF TRADING WINDOW: pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015:</p> <p>For September, 2023 quarter, Closure of trading window intimation was given on 4th October, 2023, the last date of intimation was 30th September, 2023.</p>	SEBI (PIT) Regulation, 2015	late Intimation to Stock Exchanges	-	-	-	-	late intimation for quarter ended September, 2023.	Due to nonavailability of signatories, the company has filled the Intimation with stock exchanges lately.	late intimation
7	<p>INTIMATION UNDER REGULATION 29 OF SEBI (LODR), 2015:</p> <p>Prior intimation of Board Meeting held on 2nd of July, 2023 was not on time.</p>	29 of SEBI (LODR), 2015	late prior Intimation to Stock Exchanges	Fine imposed	Fine	late prior Intimation	NSE-11800 BSE-11800	Prior intimation of Board Meeting held on 2nd of July, 2023 was not on time.	<p>Due to some technical issues company has filled the Notice with stock exchanges lately.</p> <p>Further with reference to this fine imposed by stock exchange paid by the same.</p>	Delay in prior intimation.

Place: New Delhi
Date: 30/05/2024

For Yogesh K & Associates
(Company Secretaries)

Yogesh Kumar

Digitally signed by
Yogesh Kumar
Date: 2024.05.30
22:37:09 +05'30'

CS Yogesh Kumar

Proprietor

M. No. A60866

C.P. No. 23576

PR 4659/2023

UDIN: A060866F000503101