



May 29, 2024

To,  
**Corporate Relationship Department**  
**BSE Limited**  
P. J. Towers, 1st Floor,  
Dalal Street,  
Mumbai-400001  
**Scrip Code: 526169**

Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report of the Company for the year ended March 31, 2024 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

With reference to the subject captioned above, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2024, in the prescribed format, issued by Dhruvil M. Shah & Co. LLP, Practicing Company Secretaries, Mumbai, Secretarial Auditors of the Company.

This is for your information and records.

Thanking you,

Yours faithfully,

**For Multibase India Limited**

**Parmy Kamani**  
**Company Secretary & Compliance Officer**  
M. No.: A27788

Encl.: As mentioned above

**Multibase India limited**



Ref No: 356/2024-25

**SECRETARIAL COMPLIANCE REPORT OF MULTIBASE INDIA LIMITED  
(For the Financial Year ended March 31, 2024)**

*Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015*

To,  
Multibase India Limited  
CIN: L01122DD1991PLC002959  
74 / 5&6, Daman Industrial Estate,  
Kadaiya, Nani Daman,  
Daman 396 210

We, **Dhrumil M. Shah & Co. LLP** have examined:

- all the documents and records made available to us and explanation provided by **Multibase India Limited** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchange.
- website of the listed entity,
- any other documents/ filings, as may be relevant, which has been relied upon to make this report,

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

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not applicable as there was no reportable event during the financial year under review**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **Not applicable as there was no reportable event during the financial year under review**



- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable as there was no reportable event during the financial year under review**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable as there was no reportable event during the financial year under review**
- 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;

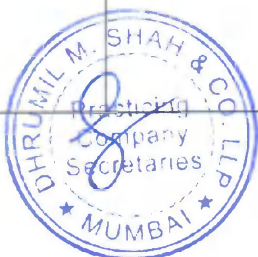
and circulars / guidelines issued thereunder and based on the above examination, we hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.

(b) There were no observations made in previous Annual Secretarial Compliance Reports.

I. We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
1)	<b>Secretarial Standards:</b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	Nil
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> </ul>	Yes	Nil
	<ul style="list-style-type: none"> <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>	Yes	Nil



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
3)	<b>Maintenance and disclosures on Website:</b>	Yes	Nil
	<ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website</li> </ul>	Yes	Nil
	<ul style="list-style-type: none"> <li>Timely dissemination of the documents/ information under a separate section on the website</li> </ul>	Yes	Nil
4)	<b>Disqualification of Director:</b>	Yes	Nil
	None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.		
5)	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b>	NA	The Listed entity does not have any subsidiary company
	<ul style="list-style-type: none"> <li>a) Identification of material subsidiary companies</li> <li>b) Disclosure requirement of material as well as other subsidiaries</li> </ul>		
6)	<b>Preservation of Documents:</b>	Yes	Nil
	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.		
7)	<b>Performance Evaluation:</b>	Yes	Nil
	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.		



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
8)	<b>Related Party Transactions:</b> a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or 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.	Yes  NA	Nil  No such instances observed
9)	<b>Disclosure of events or information:</b>  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.	Yes	Nil
10)	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11)	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  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 thereunder	Yes	Nil
12)	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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	Yes	Price Waterhouse LLP, Chartered Accountants (Firm's Registration No: 301112E/E30026 4). Chartered Accountants Firm Registration No. 102105W)





Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
	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>were initially appointed as the Statutory Auditors at the Listed entity Annual General Meeting (AGM) on September 21, 2021, for a term of 5 consecutive years, from the conclusion of the 30<sup>th</sup> Annual General Meeting till the conclusion of the 35<sup>th</sup> Annual General Meeting (Financial year 2021-22 to 2025-26). However, they resigned from their position effective August 08, 2023.</p> <p>Price Waterhouse LLP issued a Limited Review Report on August 08, 2023, for the quarter ended June 30, 2023, as their resignation occurred within 45 days from the end of the quarter of a financial year.</p> <p>Subsequently, MSKA &amp; Associates, Chartered Accountants (Firm's Registration No: 105047W), were appointed as the new Statutory Auditors during an AGM held on</p>



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS
			<p>September 15, 2023, filling the vacancy until the conclusion of the thirty-second AGM.</p> <p>Upon recommendation by the Audit Committee and Board, MSKA &amp; Associates, Chartered Accountants, has been re-appointed as the Statutory Auditors for a term of 5 consecutive years, from the conclusion of the 32<sup>nd</sup> Annual General Meeting till the conclusion of the 37<sup>th</sup> Annual General Meeting during an AGM held on September 15, 2023.</p>
13)	<p><b>Additional Non-compliances, if any:</b></p> <p>No additional non-compliance observed for any SEBI regulation/ circular/guidance note etc.</p>	Yes	Nil

**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 Dhrumil M. Shah & Co. LLP  
Practising Company Secretaries  
ICSI URN: L2023MH013400  
PRN: 3147/2023



A handwritten signature in blue ink, appearing to be "Dhiraj R. Palav".

Place: Mumbai  
Date: May 29, 2024

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Dhiraj R. Palav  
Partner  
ACS 61639 | CP 26159  
UDIN: A061639F000467748