

29.05.2024

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| To,<br>The General Manager<br>Listing Compliances<br><b>BSE Limited</b><br>Phiroze Jeejeebhoy Towers<br>Dalal Street, Mumbai—400001<br><b>Scrip Code:533644</b> | To,<br>The General Manager<br>Listing Compliances<br><b>National Stock Exchange of India Limited</b><br>Exchange Plaza, Bandra Kurla Complex<br>Bandra (East), Mumbai-400001<br><b>Symbol: UJAAS</b> |
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**Sub: Submission of Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2024**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2024, issued by Ashish Karodia & Co., Company Secretaries, the Secretarial Auditors of the Company.

The above information will also be made available on the website of the Company at <https://www.ujaas.com/>

We request you to kindly take the above information on record.

**Thanking you,  
For Ujaas Energy Limited**

**Sarvesh  
Diwan**  
Digitally signed by Sarvesh Diwan  
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2.5.4.20=4367550990468146da5f3dbd87e60d  
e13dc66e710a826aabb1ee5b6409a,  
postalCode=452003,  
street=HEARST HOSPITAL INDORE Indore Indore,  
pseudonym=441d8cd98f00b204e9800998ecf842  
7e,  
serialNumber=65041f888d3b575aad77642790b  
a1b12c7175c5e4e832cdde0c561b24da05,  
o=Personal, cn=Sarvesh Diwan  
Date: 2024.05.29 17:15:38 +05'30'

**Sarvesh Diwan  
Company Secretary  
and Compliance Officer**

**Encl: as above**



**UJAAS ENERGY LIMITED**

Office: Survey No. 211/1, Opposite Sector-C and Metalman, Sanwer Road Industrial Area, Indore 452015 (MP)  
CIN: L31200MP1999PLC013571 | Phone: +91-731-4715300 | Fax: +91-731-4715344  
Email: [info@ujaas.com](mailto:info@ujaas.com) | Website: [www.ujaas.com](http://www.ujaas.com)

**Ashish Karodia**  
M.Com., LLB, F.C.S.

**Company Secretary**

208, Trade House, 14/3, South  
Tukoganj, Indore (M.P.)  
Cell: +91 98261 – 14533  
Email:ashishkarodia@gmail.com

**Secretarial Compliance Report of UJAAS ENERGY LIMITED for the year ended 31<sup>st</sup> March,  
2024**

I, CS Ashish Karodia, Practicing Company Secretary, Indore have examined:

- a) all the documents and records made available to us and explanation provided by **Ujaas Energy Limited** (“the listed entity”) having CINL31200MP1999PLC013571,
- b) the filings/ submissions made by the listed entity to the stockexchanges,
- c) **website of the listed entity**,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this clarification,

for the year ended **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 (Regulations) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India(“SEBI”);

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

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations,2015.
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations,2011.
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 – **Not Applicable as the Company has not bought back any of its securities during the year under review**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 – **Not applicable as the Company has not issued any kind of securities during the period under scrutiny.**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 – **Not Applicable as the Company has not issued any debt securities during the year under review.**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 – **Not Applicable as the Company has not issued any Non-Convertible and Redeemable Preference Shares during the year under review**



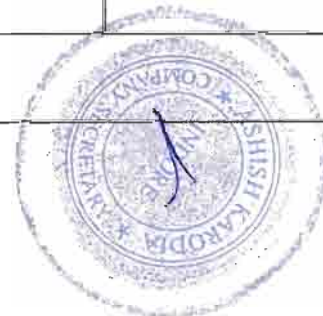
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 as amended from time to time. **Not Applicable as the Company has not bought back any of its securities during the year under review**
- k) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investments and External Commercial Borrowings and circulars/ guidelines issued thereunder;NA

And based on the above examination, I hereby report that, during the Review Period:

| Sr. No. | Particulars   | Compliance status (Yes/No/NA) | Observations /Remarks |
|---------|---|-------------------------------|-----------------------|
| 1       | Secretarial Standard<br>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                           |                       |
| 2       | Adoption and timely updation of the Policies: <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>   | YES                           |                       |
| 3       | Maintenance and disclosures on Website: <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul> | YES                           |                       |
| 4       | Disqualification of Director:<br>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity  | YES                           |                       |



|    |   |     |  |
|----|---|-----|--|
| 5  | To examine details related to Subsidiaries of listed entities:<br>(a) Identification of material subsidiary companies<br>(b) Requirements with respect to disclosure of material as well as other subsidiaries  | NA  |  |
| 6  | Preservation of Documents:<br>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under <b>SEBI LODR Regulations,2015</b>  | YES |  |
| 7  | Performance Evaluation:<br>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations   | YES |  |
| 8  | Related Party Transactions:<br>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions<br>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee | YES |  |
| 9  | Disclosure of events or information:<br>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.   | YES |  |
| 10 | Prohibition of Insider Trading:<br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI(Prohibition of Insider Trading) Regulations, 2015  | YES |  |
| 11 | Actions taken by SEBI or Stock Exchange(s), if any:<br>No Actions 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 |  |

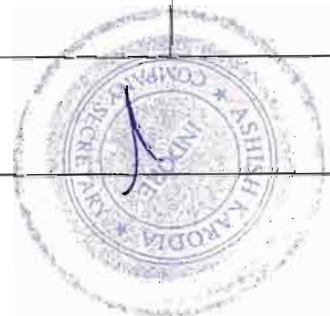


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| 12 | Resignation of statutory auditors from the listed entity or its material subsidiaries:<br>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / 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. | NA  |  |
| 13 | Additional Non-compliances, if any:<br>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.   | YES |  |

Further we report that:

(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: –

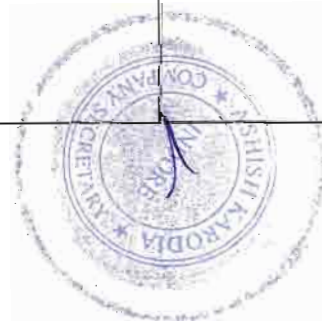
| S<br>N<br>O | Compliance Requirement (Regulations /circulars/ guidelines Including specific clause)   | Regulation/ Circular No.      | Action Taken by       | Type of Action Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc. | Details of Violation                     | Fine Amount | Observations/ Remarks of the Practicing Company Secretary   | Management-Response | Remark |
|-------------|---|-------------------------------|-----------------------|---|--|-------------|---|---------------------|--------|
| 1           | <b>non-compliance with Regulation 17,18,19,20 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)</b> | <b>Regulation 17,18,19,20</b> | Bombay Stock Exchange | Fine of Rs. 567580  | Non compliance of Regulation 17,18,19,20 | Rs. 567580  | Company has paid the amount on 10.04.2024. And also has received approval on filed waiver applications. |                     |        |



|   |   |                               |                         |                    |  |            |  |  |  |
|---|---|-------------------------------|-------------------------|--------------------|--|------------|--|--|--|
| 2 | <b>non-compliance with Regulation 17,18,19,20 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")</b> | <b>Regulation 17,18,19,20</b> | National Stock Exchange | Fine of Rs. 567580 | Non compliance of Regulation 17,18,19,20 | Rs. 567580 | Company has paid the amount on 10.04.2024. And also has received approval on filed waiver application. |  |  |
| 3 | <b>non-compliance with Regulation 28(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")</b>       | <b>Regulation 28(1)</b>       | National Stock Exchange | Fine of Rs. 59000  | Non compliance of Regulation 28(1)       | Rs. 59000  | Company has applied for the waiver of penalty imposed by NSE   |  |  |

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

| SNO | Compliance Requirement (Regulations /circulars/ guidelines Including specific clause) | Regulation/ Circular No. | Action Taken by       | Type of Action Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc. | Details of Violation            | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management-Response | Remark |
|-----|---|--------------------------|-----------------------|---|---------------------------------|-------------|---|---------------------|--------|
| 1   | <b>Non-submission of the financial results within the period prescribed</b>           | Regulation 33            | Bombay Stock Exchange | Fine of Rs. 47200   | Non compliance of Regulation 33 | Rs. 47200   | Company has paid the amount on 10.04.2024.                |                     |        |

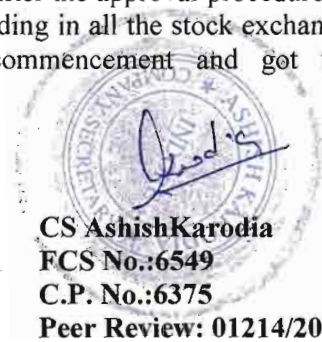


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| under this regulation (For the quarter/year ended March 2021) |  |  |  |  |  |  |  |  |  |
| <b>Late submission</b>  |  |  |  |  |  |  |  |  |  |
| Impact of Audit Qualification late Submitted                  |  |  |  |  |  |  |  |  |  |

**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 report 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

\*The Hon'ble NCLT has approved the resolution plan on 13.10.2023, after the approval procedure for implementing the resolution plan has been going on. due to procedural reason the trading in all the stock exchange was suspended till 31.03.2023 but the Company has filed application for recommencement and got the approval for recommencement on 12.04.2024.



**CS Ashish Karodia**  
**FCS No.: 6549**  
**C.P. No.: 6375**  
**Peer Review: 01214/2021**

**Place: Indore**  
**Date: 29.05.2024**  
**UDIN: F006549F000488910**