



**July 04, 2024**

To,  
The General Manager  
**BSE Limited**  
P.J. Towers, Dalal Street,  
Mumbai – 400 001

**Scrip Code – 538923**

Dear Sir/Mam,

**Sub: Annual Secretarial Compliance Report for Financial Year 2023-24**  
**Ref.: Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with relevant SEBI circulars issued from time to time, please find enclosed herewith Annual Secretarial Compliance Report for the financial year 2023-24.

This is for your information and records.

Thanking you,

**For Sofcom Systems Limited**

PRITI APURVBHAI  
SHAH

Digitally signed by PRITI  
APURVBHAI SHAH  
Date: 2024.07.04  
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**Priti Apurvbhai Shah**  
**Managing Director**  
**DIN: 07165786**

M/S DEEPTI & ASSOCIATES  
PRACTICISING COMPANY SECRETARIES

**Annual Secretarial Compliance Report of**  
**Sofcom Systems Limited**  
(CIN: L72200RJ1995PLC010192)  
**For the Financial Year ended March 31, 2024**

**The Members,**  
**Sofcom Systems Limited**  
**Jaipur – 302 001**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Sofcom Systems Limited** having its Registered Office at D-36, Subhash Marg, Flat No. 802 Sheel Mohar Apartment, C-Scheme, Jaipur, Rajasthan, India, 302001. 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined:

- a) all the documents and records made available to me and explanation provided by Sofcom Systems 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 certification;

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 (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

**REGD. OFF:- C-101, NARAINA VIHAR, NEW DELHI-110028, PH:7982571451/9953640992 EMAIL: dgkassociates01@gmail.com**

- 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 no securities were bought back during the term under review*
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *Not Applicable as no such scheme was introduced for Employees*
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *Not Applicable as no Debt securities are listed or issued by the Company*
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *Not Applicable as no such securities are listed or issued by the Company*
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; *Not applicable for the review period*
- k) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

And based on the above examination and confirmation received from management of the Company as and wherever required, I 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><b><u>Secretarial Standards:</u></b></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>	No	As provided in point no 3 of Table (a) of this report
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	Yes	-
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <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>	No	The company doesn't have functional website and the disclosures were not made on timely basis as per SEBI (LODR) 2015 requirements.
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	-

5.	<p><b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b></p> <ul style="list-style-type: none"> <li>• Identification of material subsidiary companies</li> <li>• Requirements with respect to disclosure of material as well as other subsidiaries</li> </ul>	NA	The Company do not have any Subsidiary.
6.	<p><b><u>Preservation of Documents:</u></b></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	-
7.	<p><b><u>Performance Evaluation:</u></b></p> <p>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.</p>	Yes	-
8.	<p><b><u>Related Party Transactions:</u></b></p> <ul style="list-style-type: none"> <li>• The listed entity has obtained prior approval of Audit Committee for all related party transactions.</li> <li>• 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.</li> </ul>	Yes	-
9.	<p><b><u>Disclosure of events or information:</u></b></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 thereunder.</p>	Yes	Except as mentioned in Table (a) of this report
10.	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	NO	The Company has installed SDD software but does not carried out any entries.
11.	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>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.</p>	Yes	As provided in Table (a) of said report
12.	<p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></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</p>	No	The Statutory Auditor has resigned during the financial year.

	V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities read with CIR/CFD/CMD1/114/2019 dated October 18, 2019.		The details are as provided in Table (c) of said report
13.	<b><u>Additional non-compliances, if any:</u></b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	As provided in Table (a) of said report

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/Fine /Show Cause Notice/ Warning , etc.)	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response
1.	As per Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015 Shareholding Pattern needs to be filed for each quarter to stock exchange	Regulation 31(1)(b) of SEBI (LODR) Regulation , 2015	There was a delay in filing of Shareholding Pattern for the quarter ended on 31.03.2024 and 31.03.2023	BSE	Fine	Rs. 2,73,760/- Including GST.	The company has submitted Shareholding Pattern under 31(1)(b) of SEBI (LODR) Regulations, 2015 with BSE for the quarter ended on 31.03.2024, it was filed on 24 <sup>th</sup> June, 2024 for which due date was 21.04.2024  For the quarter ended on 31.03.2023, it was filed on 26 <sup>th</sup> April, 2023 for which due date was 21.04.2023	The company has duly paid Penalty of Rs. 2,73,760/- and compliance officer will ensure timely filing to the Exchange in future.
2.	As per the Regulation 76 of SEBI (Depositories and Participants) Regulation, 2018 Reconciliation of share capital audit report needs to be filed for each quarter to stock exchange	Regulation 76 of SEBI (Depositories and Participants) Regulation , 2018	There was delay in submission of Reconciliation of share capital audit report for quarter 31.12.2023	-	-	-	The company has submitted Reconciliation of share capital audit report under Regulation 76 of SEBI (Depositories and Participants), 2018 with BSE on 21 <sup>st</sup> June, 2024 for	The company will take extra precaution for avoidance of such non-compliance.

			and 31.03.2024				the quarter ended on 31.12.2023 which was due on 30.01.2024  For the quarter ended on 31.03.2024, it was filed on 21 <sup>st</sup> June, 2024 for which due date was 30.04.2024	
3.	As per the Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018 Compliance Certificate needs to be filed for each quarter to stock exchange	Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018	There was delay in submission of Certificate with Stock Exchange for Quarter ended on 30.06.2023, 30.09.2023, 31.12.2023 & 31.03.2024	-	-	-	The company has submitted Certificate under Regulation 74(5) of SEBI (Depositories and Participants) Regulation, 2018 with BSE on 17 <sup>th</sup> July, 2023 for the quarter ended on 30.06.2023 which was due on 15.07.2023  For the quarter ended on 30.09.2023, it was filed on 17 <sup>th</sup> October, 2023 for which due date was 15.10.2023  For the quarter ended on 31.12.2023, it was filed on 25 <sup>th</sup> June, 2024 for which due date was 15.01.2024  For the quarter ended on 31.03.2024, it was filed on 25 <sup>th</sup> June, 2024 for which due date was 15.04.2024	The company will take extra precaution for avoidance of such non-compliance.
4.	As per Regulation 27(2) of SEBI (LODR) Regulations, 2015 Corporate Governance Report needs to be filed for each quarter to stock exchange	Regulation 27(2) of SEBI (LODR) Regulations, 2015	Delay and Non-Submission of Corporate Governance Report with Stock	-	-	-	The company has submitted Corporate Governance Report under Regulation 27(2) of SEBI (LODR) Regulations, 2015 with BSE on 24 <sup>th</sup>	The company will take extra precaution for avoidance of such non-compliance.

			Exchange for the Quarter ended on 31.12.2023 & 31.03.2024				June, 2024 for the quarter ended on 31.12.2023 which was due on 21.01.2024  The company has not filed Corporate Governance Report for the quarter ended on 31.03.2024	
5.	As per Regulation 13(3) of SEBI (LODR) Regulations, 2015 Investor Grievance Report needs to be filed for each quarter to stock exchange	Regulation 13(3) of SEBI (LODR) Regulations, 2015	There was delay in submission of Investor Grievance Report for Quarter ended on 31.03.2024	BSE	Fine	Rs. 76,700 /- Including GST.	The company has submitted Investor Grievance Report under Regulation 13(3) of SEBI (LODR) Regulations, 2015 with BSE on 25 <sup>th</sup> June, 2024 for the quarter ended on 31.03.2024 which was due on 21.04.2024.	The company has duly paid Penalty of Rs. 76,700 /- and compliance officer will ensure timely filing to the Exchange in future.
6.	As per Regulation 29 of SEBI (LODR) Regulations, 2015 Prior intimation of board meeting in which financial results will be consider and approve needs to be filed for each quarter to stock exchange at least 5 clear working days before date of board meeting	Regulation 29 of SEBI (LODR) Regulations, 2015	Non-Submission of Prior intimation of board meeting with regards to financial results with Stock Exchange	BSE	Fine	Rs. 11,800 /- Including GST.	The company has not filed prior intimation of board meeting in which financial results for the quarter and half year ended on 30.09.2023 considered and approved under Regulation 29 of SEBI (LODR) Regulations, 2015 with BSE.	The company has duly paid Penalty of Rs. Rs. 11,800 /- and company will take extra precaution for avoidance of such non-compliance.
7.	As per Regulation 33 of SEBI (LODR) Regulations, 2015 Audited Standalone Financial Results for the financial year needs to be filed to the stock exchange	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-Submission of audited standalone financial results for the financial year 2023-24 with Stock Exchange	BSE	Fine	Rs. 1,71,100 /- Including GST.  *Non-compliance is continuing till date of report	The company has not filed audited standalone financial results for the financial year 2023-24 under Regulation 33 of SEBI (LODR) Regulations, 2015 with BSE which was due on 30.05.2024.	The company will take extra precaution for avoidance of such non-compliance.
8.	As per Regulation 23(9) of SEBI (LODR) Regulations, 2015 Disclosure on Related	Regulation 23(9) of SEBI (LODR)	Non-Submission of Disclosure	-	-	-	The company has not filed disclosure on Related Party Transaction for the	The company will take extra precaution for avoidance

	Party Transaction needs to be filed on half year basis with stock exchange	Regulations, 2015	on Related Party Transaction with Stock Exchange				half year ended on 31.03.2024 under Regulation 23(9) of SEBI (LODR) Regulations, 2015 and pursuant to BSE Notice Number 20211115-12 which was due on 30.05.2024	of such non-compliance.
9.	As per Regulation 47 of SEBI (LODR) Regulations, 2015 News Paper publication with regards to financial result needs to be filed for each quarter with stock exchange	Regulation 47 of SEBI (LODR) Regulations, 2015	Non-Submission of News Paper publication with regards to financial result	-	-	-	The company has not filed News Paper publication with regards to financial result under Regulation 47 of SEBI (LODR) Regulations, 2015 with BSE for the quarter ended on 30.06.2023 which was due on 11.08.2023  For the quarter ended on 31.12.2023, for which due date was 14.02.2024	The company will take extra precaution for avoidance of such non-compliance.
10.	As per Regulation 40(9)/(10) of SEBI (LODR) Regulations, 2015 certificate from a PCS certifying that all certificates have been issued within thirty days of the date of lodgment for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies needs to be filed annually with stock exchange	Regulation 40(9)/(10) of SEBI (LODR) Regulations, 2015	Delay in submission of PCS certificate under Regulation 40(9)/(10) of SEBI (LODR) Regulations, 2015	-	-	-	The company has submitted certificate from a PCS under Regulation 40(9)/(10) of SEBI (LODR) Regulations, 2015 with BSE on 25 <sup>th</sup> June, 2024 for the Financial Year ended on 31.03.2024 which was due on 30.04.2024	The company will take extra precaution for avoidance of such non-compliance.
11.	As per Regulation 7(3) of SEBI (LODR) Regulations, 2015 compliance certificate duly signed by compliance officer & authorised representative of the	Regulation 7(3) of SEBI (LODR) Regulations, 2015	There was delay in submission of compliance certificate under Regulation	-	-	-	The company has submitted Compliance Certificate under Regulation 7(3) of SEBI (LODR) Regulations, 2015 with BSE on 25 <sup>th</sup>	The company will take extra precaution for avoidance of such non-compliance.



	share transfer agent certifying that all the share transfer facility are maintained either in house or by Registrar to an issue and share transfer agent registered with the Board needs to be filed annually with stock exchange		7(3) of SEBI (LODR) Regulations, 2015				June, 2024 for the Financial Year ended on 31.03.2024 which was due on 30.04.2024	
12.	As per Regulation 30 of SEBI (LODR) Regulations, 2015 Intimation of Resignation of Director needs to be filed within 24 hours of resignation with stock exchange	Regulation 30 of SEBI (LODR) Regulation s, 2015	Non-Submission of Intimation of Resignation of Independent Director	-	-	-	Mr. Nirav Rohitkumar Shah (DIN: 07246610), Independent Director of the company has tendered his resignation via email dated December 22, 2023 but the company has not filed intimation of the same with BSE.	The company will take extra precaution for avoidance of such non-compliance.
13.	As per Regulation 6(1A) of SEBI (LODR) Regulations, 2015 Vacancy in the office of Compliance Officer shall be filled within 3 months from the date of such vacancy	Regulation 6(1A) of SEBI (LODR) Regulation s, 2015	Not fill vacancy in the office of Compliance Officer within 3 months	BSE	Fine	Rs. 1,08,560/- Including GST.	The company had appointed Mrs. Dhara Jagdishbhai Patel as Compliance Officer of the company on October 02, 2023 after resignation of previous Compliance Officer Mr. Gourishankar Boosar via letter dated February 15, 2023.  Accordingly, the company was in default for non-appointment of Compliance Officer from May 16, 2023 to October 02,2023.	The company has duly paid Penalty of Rs. 1,08,560/- and company will take extra precaution for avoidance of such non-compliance.
14.	As per Regulation 17(1)(b) of SEBI (LODR) Regulations, 2015 where the listed entity does not have a regular non-executive chairperson, at least	Regulation 17(1)(b) of SEBI (LODR) Regulation s, 2015	Board does not possess minimum number of independent directors	-	-	-	After the resignation of Mr. Nirav Rohitkumar Shah (DIN: 07246610), Independent Director on December 22, 2023, board does not	The company is in process to onboard requisite number of independent directors.

	half of the board of directors shall comprise of independent directors						comprise of requisite number of independent directors.	
15.	As per Regulation 19(1) of SEBI (LODR) Regulations, 2015 Nomination and remuneration committee shall comprise of at least three directors and all shall be non-executive directors	Regulation 19(1) of SEBI (LODR) Regulation s, 2015	All members of Nomination and remuneration committee are not non-executive directors	-	-	-	After the resignation of Mr. Nirav Rohitkumar Shah (DIN: 07246610), Independent Director on December 22, 2023, Composition of Nomination and remuneration committee does not comply with Regulation 19(1) of SEBI (LODR) Regulations, 2015	The company is in process to onboard requisite number of independent /non-executive directors.
16.	As per Regulation 44(3) of SEBI (LODR) Regulations, 2015 Voting Results shall be submitted within 2 working days of conclusion of general meeting	Regulation 44(3) of SEBI (LODR) Regulation s, 2015	Non-Submission of Voting Results in respect of postal ballot conducted	-	-	-	The company had conducted postal ballot process for which voting results was due to be file with BSE on January 02, 2024 but same has not been yet filed.	The company will take extra precaution for avoidance of such non-compliance.
17.	As per Regulation 24A of SEBI (LODR) Regulations, 2015 Annual Secretarial Compliance Report needs to be submitted within 60 days from end of each financial year with stock exchange	Regulation 24A of SEBI (LODR) Regulation s, 2015	There was delay in submission of Annual Secretarial Compliance Report for FY 2023-24	-	-	-	The Company had not filed the Annual Secretarial Compliance Report for FY 2023-24 within the prescribed timeline.	The company will take extra precaution for avoidance of such non-compliance.
18.	As per Regulation 17(1C) of SEBI (LODR) Regulations, 2015 appointment [or re-appointment] of a person on the Board of Directors [or as a manager] is taken at the next general meeting or within a time period of three months from the date of appointment, whichever is earlier:	Regulation 17(1C) of SEBI (LODR) Regulation s, 2015	The company has not convened general meeting within period of 3 months	-	-	-	Mr. Satyam Jaiswal and Mrs. Shiwaginee Jaiswal had been appointed as Managing director and Additional Non-Executive director respectively w.e.f 13.04.2023. However, the company has failed to obtain approval of Shareholders for above appointments	The company will take extra precaution for avoidance of such non-compliance.

							within a period of 3 months.	
19.	As per Regulation 31A of SEBI (LODR) Regulations, 2015 Certain conditions need to be complied for promoter re-classification	Regulation 31A of SEBI (LODR) Regulations, 2015	Non-Compliance of Regulation 31A of SEBI (LODR) Regulations, 2015	-	-	-	Board had approved re-classification request of promoter in their meeting held on September 09, 2023 but application for the same is filed on 09.02.2024.	The company will take extra precaution for avoidance of such non-compliance.
20.	As per Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2015 promoter of company shall declare that he/she, along with PAC, has not made any encumbrance, directly or indirectly, other than those already disclosed during the financial year	Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2015	Non-Submission of promoter declaration as required under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2015 for FY 2023-24	-	--	-	Mr. Kishore Mehta and Mrs. Asha Mehta being promoters of the company has not filed declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2015 which was due on 09.05.2024	The company will take extra precaution for avoidance of such non-compliance.
21.	As per SEBI Circular No. SEB/HO/DDHS/DDHS -RACPOD 1/P/CIR/2023/172 dated October 19, 2023 Listed entities needs to file certain disclosure with exchange	SEBI Circular No. SEB/HO/DDHS/DDHS -RACPOD 1/P/CIR/2023/172	Non-Submission of initial disclosure as required under SEBI Circular No. SEB/HO/DDHS/DDHS-RACPOD 1/P/CIR/2023/172 for FY 2023-24	-	-	-	The Company has not filed initial disclosure as required under SEBI Circular No. SEB/HO/DDHS/DDHS -RACPOD 1/P/CIR/2023/172 For FY 2023-24 as of financial results of quarter and year ended on 31.03.2024 are not published.	The company will take extra precaution for avoidance of such non-compliance.

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

Sr. No.	Remark	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisor y/Clarification/Fine/Show Cause Notice/Warning , etc.)	Fine Amount	Observations/ Remarks of Practicing Company Secretary	Management Response
There were no observations made in previous reports, hence no action was required to be taken by the listed entity.								

- c) 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*
<b>1</b>	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	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	<b>NO</b>	There is non-compliance of the Para 6 (A) (i) of the SEBI's Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019.  The auditor has resigned on 06.02.2024. But limited review report for the quarter ended on 31.12.2023 has been signed by another appointed auditor.
	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	<b>NA</b>	
	II. 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 limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	<b>NA</b>	
<b>2</b>	<b>Other conditions relating to resignation of statutory auditor</b>		
	Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:  a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / noncooperation 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.  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 company, the auditor has informed the Audit Committee the details	<b>YES</b>	

	<p>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>		
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.	<b>NO</b>	The listed entity has not 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.

**Assumptions & Limitation of scope and Review:**

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

Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

We have not verified the correctness and appropriateness of Financial Records and Books of Accounts of the listed entity.

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 Deepti & Associates**  
*Practicing Company Secretaries*

**Deepti Grover** DEEPTI GROVER  
 Proprietor  
 FCS. No. 7654 | C.P.: 17546  
 FRN: S2016DE438900  
 UDIN: **F007654F000667940**

Digitally signed by DEEPTI GROVER  
 Date: 2024.07.04 15:19:48 +05'30'

**July 04, 2024**  
**New Delhi**