



BAFNA PHARMACEUTICALS LIMITED

REGD. OFFICE: "BAFNA TOWERS", NO.299, THAMBU CHETTY STREET, CHENNAI – 600001, TAMIL NADU, INDIA
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CIN:L24294TN1995PLCO30698

Date: May 30, 2024

To

BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400001.	National Stock Exchange of India Limited, Exchange Plaza, Bandra Kurla Complex, Bandra East, Mumbai – 400051.
Scrip Code: 532989	Scrip Code: BAFNAPH

Dear Sir/Madam,

Subject: Submission of Annual Secretarial Compliance Report

Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated 8th February, 2019, we are herewith filing the Annual Secretarial Compliance Report issued by M/s. A.K. Jain & Associates, Company Secretaries, Chennai, for the financial year ended 31st March, 2024,

We request you to take the document on record.

Thanking You.

For **BAFNA PHARMACEUTICALS LIMITED**

Shanmugam Hemalatha

Whole-Time Director
(DIN: 02714329)



S. Anil Kumar Jain B.Com., FCS

Balu Sridhar M.A.C.S., FCS., LLB

Pankaj Mehta B.Com (C.S.), ACS

SECRETARIAL COMPLIANCE REPORT
of
BAFNA PHARMACEUTICALS LIMITED
For the Financial Year ended 31st March, 2024

We, **M/s. A K Jain & Associates, Practicing Company Secretaries**, have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. BAFNA PHARMACEUTICALS 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 31st March, 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



(d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(e) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(f) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;

and circulars/ guidelines issued thereunder;

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	Secretarial Standards:		
	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.	Yes	NA
2	Adoption and timely updation of the Policies:		
	<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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	NA



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3	Maintenance and disclosures on Website:		
	<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. 	Yes	NA
4	Disqualification of Director:		
	None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013.	Yes	NA
5	Details related to Subsidiaries of listed entities have been examined w.r.t.:		
	<p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	The listed entity does not have any material subsidiary
6	Preservation of Documents:		
	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.	Yes	NA
7	Performance Evaluation:		
	The listed entity has conducted performance evaluation of the Board, Independent Directors and the		

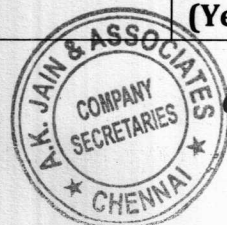
	Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	NA
8	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	NA
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee.	Not Applicable	NA
9	Disclosure of events or information:		
	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	NA
10	Prohibition of Insider Trading:		
	The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NA
11	Actions taken by SEBI or Stock Exchange(s), if any:		
	No action(s) has been taken against the listed entity/ its promoters/ directors 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 except as provided under separate paragraph herein(**).	No	The Actions taken against the Listed Entity / its Promoters by the Stock Exchanges is provided under Paragraph (a).



12	Additional Non-compliances, if any:		
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	<p>a) <i>The Board of Directors of the Company did not comprise of minimum of six directors as required under Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015 until 26.06.2023.</i></p> <p>b) <i>The Company has not complied with Regulation 17(1C) with respect to re-appointment of Ms. Shanmugam Hemalatha as Whole-Time Director of the Company. The Company has not made necessary disclosure as required under Regulation 30 read with Schedule III of SEBI (LODR) Regulation, 2015 for re-appointment of Ms. Shanmugam Hemalatha as whole time Director of the Company approved in the Board Meeting held on 11.08.2023.</i></p>

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)	Observations /Remarks by



		/ NA)	PCS*
1	Compliances with the following conditions while appointing/re-appointing an auditor		
	<p>(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</p> <p>(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</p> <p>(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 limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	NA	No such instances during the Audit Period
2	Other conditions relating to resignation of statutory auditor		
	<p>(i) Reporting of concerns by Auditor with respect to the listed entity to the Audit Committee:</p> <p>(a) In case of any concern with the management of the listed entity 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 company, 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</p>	NA	No such resignation



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	<p>views to the management and the auditor.</p> <p>(ii) Disclaimer in case of non-receipt of information:</p> <p>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>		
3	<p>The listed entity 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 18thOctober, 2019.</p>	NA	No such resignation



(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:

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	Appointment of Qualified Company Secretary as Compliance Officer	Regulation 6 of SEBI (LODR) Regulations, 2015	The Company has not appointed Qualified Company Secretary as Compliance Officer for the Quarter ended 31.03.2023	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 22.05.2023 Fine Imposed by NSE vide Notice Dtd 22.05.2023	Non-Compliance of Regulation 6 of SEBI (LODR) Regulations, 2015	BSE - Rs.57,800/- (Inclusive of GST) NSE - Rs.57,800/- (Inclusive of GST)	The Company has not appointed Qualified Company Secretary as Compliance Officer for the Quarter ended 31.03.2023 and for period 01.04.2023 to 07.04.2023	The Company could not appoint a qualified Company Secretary as Compliance officer of the Company in spite of the earnest efforts taken by the Company. The Company has applied for waiver of penalties levied by BSE & NSE with respective Stock Exchanges.	NA
2	Appointment of Qualified Company Secretary as Compliance Officer	Regulation 6 of SEBI (LODR) Regulations 2015	The Company has not appointed Qualified Company Secretary as Compliance Officer for the period 01.04.2023 to 07.04.2023	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 21.08.2023 Fine Imposed by NSE vide Notice Dtd 21.08.2023	Non-Compliance of Regulation 6 of SEBI (LODR) Regulations, 2015	BSE - Rs.8,260/- (Inclusive of GST) NSE - Rs. 8,260/- (Inclusive of GST)	The Company has not appointed Qualified Company Secretary as Compliance Officer for the period 01.04.2023 to 07.04.2023	The Company has appointed Mr. Vishnu Vasudeva Kuppa, a Qualified Company Secretary as Compliance officer of the Company w.e.f 07.04.2024. Further the Company has made the payment of fines imposed by BSE & NSE on 25.08.2023.	NA



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3	Disclosure of Related Party Transactions	Regulation 23(9) of SEBI (LODR) Regulations 2015	Delay in submission of disclosure of Related Party Transactions for the half year ended 31.03.2023.	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 30.06.2023 Fine Imposed by NSE vide Notice Dtd 30.06.2023	Non-compliance with disclosure of related party transactions under Regulation 23(9) of SEBI (LODR) Regulations, 2015	BSE - Rs.11,800/- (Inclusive of GST) NSE - Rs. 11,800/- (Inclusive of GST)	The Company has belatedly submitted the disclosure of Related Party Transactions for the half year ended 31.03.2023, with a delay of 2 days.	The delay was due to technical issues faced by the Company. The Company has taken necessary steps to avoid such non-compliance in future.	NA
4	Minimum Public Shareholding	Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The Company did not comply with the Minimum Public Shareholding requirements for period 01.01.2023 to 23.02.2023	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 25.05.2023 Fine Imposed by NSE vide Notice Dtd 25.05.2023	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015	BSE - Rs.3,18,600/- (Inclusive of GST) NSE - Rs. 3,18,600/- (Inclusive of GST)	The Company did not comply with the Minimum Public Shareholding requirements as required under Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957.	The Company & Promoters have taken earnest efforts to achieve Minimum Public Shareholding. The Company will ensure that the Minimum Public Shareholding will be achieved in the ensuing year.	NA
5	Minimum Public Shareholding	Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation)	The Company did not comply with the Minimum Public Shareholding requirements of 10% for period 10.09.2023 to 30.09.2023	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 16.11.2023 Fine Imposed by NSE vide Notice	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015	BSE - Rs.1,23,900/- (Inclusive of GST) NSE - Rs.1,23,900/- (Inclusive of GST)	The Company did not comply with the Minimum Public Shareholding requirements as required under Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the	During the year, the Company & Promoters have taken earnest efforts to achieve Minimum Public Shareholding. M/s. SRJR Life Sciences LLP, Promoter of the Company also made an Offer for Sale of 35,48,143 Equity Shares representing 15% of total Paid-up capital of the Company, on September 06, 2023, through	NA



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		Rules, 1957			Dtd 16.11.2023			Securities Contracts (Regulation) Rules, 1957.	Stock Exchange Mechanism. However, the offer was subscribed only to an extent of 1,57,248 Equity Shares by non-retail investors on September 07,2023 and 1,41,418 equity shares by retail investors on September 08, 2023. The Company will ensure that the Minimum Public Shareholding will be achieved in the ensuing year.	
6	Minimum Public Shareholding	Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The Company did not comply with the Minimum Public Shareholding requirements of 10% for the quarter ended 31.12.2023	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 15.02.2024 Fine Imposed by NSE vide Notice Dtd 15.02.2024	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015	BSE - Rs.5,42,800/- (Inclusive of GST) NSE - Rs.5,42,800/- (Inclusive of GST)	The Company did not comply with the Minimum Public Shareholding requirements as required under Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The Company & Promoters have taken earnest efforts to achieve Minimum Public Shareholding. The Company will ensure that the Minimum Public Shareholding will be achieved in the ensuing year.	NA
7	Minimum Public Shareholding	Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts (Regulation) Rules, 1957	The Company did not comply with the Minimum Public Shareholding requirements of 10% for the quarter ended 31.03.2024	BSE & NSE	Fine Imposed by BSE vide E-Mail Notice Dtd 21.05.2024 Fine Imposed by NSE vide Notice Dtd 21.05.2	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015	BSE - Rs.5,36,900/- (Inclusive of GST) NSE - Rs.5,36,900/- (Inclusive of GST)	The Company did not comply with the Minimum Public Shareholding requirements as required under Regulation 38 of SEBI (LODR) Regulations read with Rule 19(2) and Rule 19A of the Securities Contracts	The fall in Minimum Public Shareholding (MPS) below The Company & Promoters have taken earnest efforts to achieve Minimum Public Shareholding. The Company will ensure that the Minimum Public Shareholding will be achieved in the ensuing year.	NA



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				024			(Regulation) Rules, 1957		
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations / Remarks of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance report for the year ended	Compliance Requirement (Regulations / Circulars / Guidelines including specific clause	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The Company has not appointed Qualified Company Secretary as Compliance Officer for the Quarter ended 31.03.2023.	The Company has not appointed Qualified Company Secretary as Compliance Officer for the Quarter ended 31.03.2023.	Appointment of Qualified Company Secretary as Compliance Officer	Non-Compliance of Regulation 6 of SEBI (LODR) Regulations, 2015 BSE - Rs.57,800/- (Inclusive of GST) NSE - Rs.57,800/- (Inclusive of GST)	The Company could not appoint a qualified Company Secretary as Compliance officer of the Company in spite of the earnest efforts taken by the Company. The Company has applied for waiver of penalties levied by BSE & NSE with respective Stock Exchanges. Thereafter the Company has taken necessary steps and appointed a Company Secretary w.e.f. 07.04.2023.	The Company has appointed the Company Secretary w.e.f 07.04.2023 and complied with the Regulation 6 of SEBI (LODR) Regulations, 2015.
2	The composition of Board of Directors of the Company is not in compliance with Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015 with effect from 14.01.2023.	The composition of Board of Directors of the Company is not in compliance with Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015 with effect from 14.01.2023.	The Board of Directors of Top 2000 Listed Companies shall comprise of not less than Six (6) Directors	Non-Compliance of Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015,	The decrease in the number of was due to the resignation of Mr. Atul Sachdeva, Non-Executive Director, on 13.01.2023. The process of appointment of Directors took more time to fill the position and the Company has appointed Three new Directors on the Board on 26.06.2023	The Company has appointed necessary number of Directors on 26.06.2023 and complied with Regulation 17(1)(c) of SEBI (LODR) Regulations, 2015



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3	The composition of the Stakeholders Relationship Committee did not comprise of requisite number of Directors, as prescribed under Regulation 20(2A) of SEBI (LODR) Regulations, 2015, during the period from 14.01.2023 to 31.03.2023	The composition of the Stakeholders Relationship Committee did not comprise of requisite number of Directors, as prescribed under Regulation 20(2A) of SEBI (LODR) Regulations, 2015, during the period from 14.01.2023 to 31.03.2023	The composition of the Stakeholders Relationship Committee did not comprise of requisite number of Directors, during the period from 14.01.2023 to 31.03.2023	Non-Compliance of Regulation 20(2A) of SEBI (LODR) Regulations, 2015,	The decrease in the number of members of Stakeholders Relationship Committee was due to the resignation of Mr. Atul Sachdeva, Non-Executive Director, on 13.01.2023 who was also member of Stakeholders Relationship committee. The Board of Directors in its meeting held on 07.04.2023 has appointed Mrs. Akila C Raju, Non-Executive Director as member of Stakeholders Relationship Committee, within a period of 3 months, thereby complying with Regulation 20(2A) of SEBI (LODR) Regulations, 2015	The Company has re-constituted the Stakeholders Relationship Committee on 07.04.2023 and complied with Regulation 20(2A) of SEBI (LODR) Regulations, 2015.
4	No Stakeholders Relationship Committee meeting was held during the year under review as prescribed under Regulation 20(3A) of SEBI (LODR) Regulations, 2015.	No Stakeholders Relationship Committee meeting was held during the year under review as prescribed under Regulation 20(3A) of SEBI (LODR) Regulations, 2015.	The meeting of Stakeholders Relationship Committee was not held during the financial year 2022-2023	Non-Compliance of Regulation 20(3A) of SEBI (LODR) Regulations, 2015,	As no complaints or grievances were received by the Company during the FY 2022-23, as such, the Stakeholders relationship committee meeting was not held.	The Company has been advised to comply with the regulations and to be cautious henceforth.
5	The Company has belatedly submitted the Statement of Investor Complaint, with the National Stock Exchange, for the quarter ended 30.09.2022 as prescribed under Regulation 13(3) of SEBI (LODR) Regulations, 2015.	The Company has belatedly submitted the Statement of Investor Complaint, with the National Stock Exchange, for the quarter ended 30.09.2022 as prescribed under Regulation 13(3) of SEBI (LODR) Regulations, 2015.	The Company has belatedly submitted the Statement of Investor Complaint, with the National Stock Exchange, for the quarter ended 30.09.2022	Delay in submission of Statement of Investor Complaint, with the National Stock Exchange, for the quarter ended 30.09.2022	The delay has occurred due to connectivity issues with the NSE Portal. The Company has taken necessary steps to ensure that the filings & disclosures to be filed with the Stock Exchanges are made within the prescribed time.	The Company has taken necessary steps to ensure the timely filings & disclosures with the Stock Exchanges.



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6	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to non-dilution by Promoters of the Company	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to non-dilution by Promoters of the Company	The Company did not comply with the Minimum Public Shareholding requirements of 10% for period 01.03.2022 to 31.03.2022	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015 BSE - Rs.1,29,800/- (Inclusive of GST) NSE - Rs.1,29,800/- (Inclusive of GST)	The Company vide letter dated 08.03.2022 submitted the detailed proposal to NSE and BSE regarding the proposed sale of Equity Shares by SRJR LifeSciences LLP in order to comply with SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/43/2018 dated February 22, 2018. However due to technical issues pertaining to operation of trading account of SRJR LifeSciences LLP and closure of trading window the proposed sale got delayed. The Company later achieved the Minimum Public Shareholding of 10% on 20.09.2022. The Company had submitted waiver application.	The Company achieved the Minimum Public Shareholding of 10% on 20.09.2022.
7	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to non-dilution by Promoters of the Company	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to non-dilution by Promoters of the Company	The Company did not comply with the Minimum Public Shareholding requirements of 10% for period 01.04.2022 to 30.06.2022	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015 BSE - Rs.5,36,900/- (Inclusive of GST) NSE - Rs.5,36,900/- (Inclusive of GST)	The delay in achieving the Minimum Public Shareholding is due to closure of trading window from 01st April 2022 to 29th May, 2022. The Promoters sold a total of 73,762 shares from 01st June, 2022 to 30th June, 2022. The Company later achieved the Minimum Public Shareholding of 10% on 20.09.2022. The Company had submitted waiver application.	The Company achieved the Minimum Public Shareholding of 10% on 20.09.2022.
8	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to Purchase of Shares in open	The Company did not comply with the Minimum Public Shareholding requirements of 10% due to Purchase of Shares in open market	The Company did not comply with the Minimum Public Shareholding requirements of 10% for the	Non-Compliance of Regulation 38 of SEBI (LODR) Regulations, 2015 BSE - Rs.5,42,800/- (Inclusive of GST)	The fall in Minimum Public Shareholding (MPS) below 10% (Decrease by 0.02%) during quarter ended on 31st December, 2022 is due to open market purchase by one of the Promoter.	The Company achieved the Minimum Public Shareholding of 10% on 25.02.2023.



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	market by a Promoter of the Company.	by a Promoter of the Company.	quarter ended 31.12.2022	NSE - Rs.5,42,800/- (Inclusive of GST)	The Company later achieved the Minimum Public Shareholding of 10% on 25.02.2023. The Company had submitted waiver application.	
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Place: Chennai
Date: 29.05.2024

For A.K.JAIN & ASSOCIATES
Company Secretaries



B. Sridhar

BALU SRIDHAR

Partner

M.No. F5869

C.P. No. 3550

UDIN: F005869F000490551