



Globus Spirits Limited

(Corporate Identity Number: L74899DL1993PLC052177)

F-0, Ground Floor, The Mira Corporate Suites, Plot No. 1 & 2,
Ishwar Nagar, Mathura Road, New Delhi - 110065. **Tel.:** +011-66424400,
E-mail: corporateoffice@globusgroup.in, **Web:** www.globusspirits.com

Dated : 07th May'2024

The National Stock Exchange of India Limited
Exchange Plaza, C-1, Block-G
BandraKurla Complex,
Bandra (E),
Mumbai – 400 051

Sub: Clarification Letter to NSE under Regulation 30 of SEBI (LODR) Regulation, 2015 as well as Dissemination of SE Letter.

Dear Sir,

This is with reference to the above captioned subject and pursuant to your letter dated 06th May 2024, we are disseminating the letter and further it is clarified as under:

- Our interpretation upon reading the Provisions of Regulation 21 (3A) and (3C) of SEBI LODR Regulations, 2015 jointly, was that while convening the Risk Management committee Meetings in a financial year, there should not be a gap of more than 180 days in between the two Risk Management Committees in a particular financial year. Accordingly for the FY 2023-24, we did convene our two Risk Management Committee Meetings with in a time gap of 180 days between the two meetings.
- However vide your letter we are informed that it is a calendar year. This is purely an interpretation issue and not intentional at all as can be seen from the above.
- Point noted and will comply in full. Once again would emphasize that it was an inadvertent error and an understanding gap between financial and calendar year. Thanking you for the knowledge and we shall comply in full.

Kindly take note of the same.

Thanking You

Yours faithfully
for **Globus Spirits Ltd.**

Santosh Kumar Pattanayak
Company Secretary

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**BROTHERS
& Co**



National Stock Exchange Of India Limited

Ref: NSE/LIST/COMP/GLOBUSSPR/01

Date: May 06, 2024

To,
The Company Secretary
Globus Spirits Limited
F-0, The Mira Corporate Suites,
Ishwar Nagar, Mathura Road,
New Delhi – 110065

Sub: Warning Letter under SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 ('the Regulations').

Dear Sir/Madam,

This is in reference to Corporate Governance Report submitted for quarter ended September 2023 ('CGR'), submitted by Globus Spirits Limited ('Company') pertaining to Risk Management Committee meetings.

The Exchange *vide* its letter dated October 26, 2023, raised query for the gap between the Risk Management Committee meetings held, wherein the Company was requested to provide its clarification/comments. Basis Company's letter dated October 27, 2023, and CGR; it is observed that more than 180 days elapsed post the last Risk Management Committee meeting held by the Company on March 29, 2023, which is in contravention with the provisions of Regulation 21(3C) of the Regulations.

The above violation on the Company's part has been viewed seriously. The Company is hereby warned to be careful in future and exercise due diligence for complying with the provisions of the Regulations. Any repetition of such similar violation in future will be viewed seriously and appropriate action will be initiated.

In addition to the above, you are advised to disseminate this warning letter immediately to the Stock Exchange(s).

Yours faithfully,
For **National Stock Exchange of India Limited**

Raksha Jain
Senior Manager

CC:
BSE Limited
P.J. TOWERS,
DALAL STREET,
FORT, MUMBAI - 400 001.