

Precision Electronics Limited

Date: May 29, 2024

PEL/BSE/14/2024-25

BSE Limited, 25th Floor, PJ Towers, Dalal Street, Mumbai-400001

Scrip Code:

517258

Sub: Annual Secretarial Compliance Report

Ref.: Precision Electronics Limited

Dear Madam/Sir,

Pursuant to the Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 read with SEBI Circular dated February 08, 2019 bearing Ref. No. CIR/CFD/CMD1/27/2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by Munish K Sharma & Associates, Company Secretaries, for the financial year ended March 31, 2024.

The above is for your information and records.

Thanking You,

For Precision Electronics Limited

Weenita Khurana

Compliance Officer

Noida Office

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Secretarial Compliance Report of Precision Electronics Limited for the financial year ended on 31 March 2024

We, Munish K Sharma & Associates LLP, Practicing Company Secretaries have examined:

- a. all the documents and records made available to us, and explanation provided by Precision Electronics Limited ('the listed entity'),
- b. the filings/ submissions made by the listed entity to the stock exchange,
- 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 financial year ended **31 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
- the Securities Contracts (Regulation) Act, 1956 ('SCRA') and 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
- 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.
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: *Not applicable*.
- f. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021: Not applicable.

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LLPIN : ABZ-6770 | E-mail : vijay@mksadvisors.com, aditya@mksadvisors.com, munish_171@yahoo.com

- g. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.
- Securities and Exchange Board of India (Investor Protection and Education Fund)
 Regulations, 2009
 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.	Particulars	Compliance status	Observations/
No.		(Yes/ No/ NA)	Remarks by PCS*
1.	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	
2.	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 has been reviewed and timely updated as per the regulations/ circulars/ guidelines issued by SEBI.	Yes	
3.	Maintenance and Disclosures on Website: The listed entity is maintaining a functional website. Timely dissemination of the documents/information under a separate section on the website.	No	The listed entity has failed to disseminate / disclose Notice of the Board Meetings held for discussing financial results for the quarter ending 30.09.2023.

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	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.		
4.	Disqualification of Directors:		From the records available on the MCA,
	None of the Director(s) of the Company is/		none of the Director
	are disqualified under section 164 of	Yes	is disqualified,
	Companies Act, 2013 as confirmed by the		though the Company
	listed entity.		has failed to provide
			necessary disclosures
			under section 164 of
			the Companies Act,
			2013
5.	Details related to Subsidiaries of listed		
	entities have been examined w.r.t.:		
	(a) Identification of material subsidiary		
	companies.		During the period
	(b) Displaying of material as well as other	NA	under review, the
	(b) Disclosure of material as well as other subsidiaries.		listed entity does not
_			have any 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	Yes	
	Preservation of Documents and Archival policy	163	
	prescribed under SEBI (LODR) Regulations,		
	2015.		
	2015.		
7.	Performance Evaluation:		
	The listed entity has conduct performance		
	evaluation of the Board, Independent	Yes	
	Directors, and the Committees at the start of		
	every financial year as prescribed in SEBI		
	Regulations.		

8.	Related Party Transaction:		
	 a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained. 	Yes	
9.	Disclosures of events and 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.	No	1. The listed entity had filed the outcome of the Board Meeting in which financial result were discussed and approved for the quarter ended March 2023 by delay of few minutes with the stock exchange. 2. The Company had filed information relating to appointment of Mr. Rajesh Pant as an Additional Director and Non-executive Chairperson of the Company w.e.f. 11 August 2024 to the stock exchange by delay of few days. 3. The Company had not disclosed the information relating
		And Ac	to appointment of
	chaim	STA	appointment of

10.	Prohibition of Insider Trading: The listed entity is in compliance with the Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	Mr. Rajesh Pant as Director to the stock exchange. The Company has failed to maintain structured digital database containing the nature of
			unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom such information is shared.
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 except as provided under separate	NA	
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note	Yes	

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We hereby further report that the compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18 October 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	Compliances with the following con-	ditions while appointi	ng/ re-appointing an
	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		
	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	NA	
	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.		
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2. Other conditions relating to resignation of statutory auditor I. 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 non-availability as information/ non-cooperation by the management which has hampered the audit process, the auditor has approached the of the Audit Chairman Committee of the listed entity and the Audit Committee shall receive such concern directly NA immediately and without specifically waiting for the Audit quarterly 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 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.

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- 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.
- Disclaimer in case of non-receipt II. of information:

The auditor has provided an appropriate disclaimer in its audit report, which is 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.

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

Sr. No.	Compliance Requirement (Regulation/ circulars/ guidelines including specific clause)	Regula tion/ Circula r No.	De viat ion s	Actio n Take n by	Type of actio n	Details of violati on	Fine Amo unt	Observation s/ Remarks of the PCS	Manage ment Respons e	Remar ks
1.	Reg. 31 of SEBI (LODR) Regulations, 2015 – Holding of specified securities and	Reg. 31(1)(b) of SEBI (LODR) Regula	Hig h	No actio n take n	NA	Wrong data submit ted in the shareh olding	Nil	The listed entity had filed shareholding pattern for the quarters ended June		

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shareholding pattern. 2015 patter n. September 2023 and December 2023 within due time but the same were marked for resubmission due to one or the other reason and were correctly filed on 14-02-2024, 14-02-2024 and
2023 and December 2023 within due time but the same were marked for re- submission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
December 2023 within due time but the same were marked for re- submission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
2023 within due time but the same were marked for resubmission due to one or the other reason and were correctly filed on 14-02-2024, 14-
due time but the same were marked for re- submission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
the same were marked for re- submission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
were marked for resubmission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
for resubmission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
submission due to one or the other reason and were correctly filed on 14- 02-2024, 14-
due to one or the other reason and were correctly filed on 14-02-2024, 14-
due to one or the other reason and were correctly filed on 14-02-2024, 14-
the other reason and were correctly filed on 14-02-2024, 14-
reason and were correctly filed on 14-02-2024, 14-
were correctly filed on 14- 02-2024, 14-
correctly filed on 14- 02-2024, 14-
filed on 14- 02-2024, 14-
02-2024, 14-
04-03-2024
respectively
2. Reg. 23 of SEBI Reg. Lo No NA Delay Nil The listed
(LODR) 23(9) w actio in entity had
Regulations, of SEBI n submis filed
2015 - Related (LODR) take sion of disclosure of
Party Regula n the related party
Transactions tion, relate transaction
2015 d party for the half
transa year ended
ctions. 30
September
2023 with a
delay of one
day.
3. Reg. 34 of SEBI Reg. Me No NA Delay Nil The listed
(LODR) 34(1)(diu actio in entity had
A STATE OF THE STA
Annual Report (LODR) n annual report to the
Regula report stock
tion, to the exchange by
2015 stock delay of few
excha days
nge
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mpany Secretary

4.	Reg. 31 of SEBI	Reg.	Hig	No	NA	Non	Nil	Shares held	
4.	(LODR)	31(2)	h	actio	INA	mainte	IVII	by Mr. Hans	
	Regulations,	of SEBI		n		nance		Jurgen	
	2015 –	The state of the s		take		of		Wagner	
		(LODR)						(Promoter	
	Holding of	Regula		n		promo		and	
	specified	tion,				ter's		Promoter	
	securities and	2015				shareh		Group) are	
	shareholding					olding		not in	
	pattern.					in		dematerializ	
						demat		ed form.	
						erializ			
						ed			
						form			
5.	Reg. 29 of SEBI	Reg.	Lo	No	NA	Delay	Nil	(i)The listed	
	(LODR)	29 of	w	actio		in		entity had	
	Regulations,	SEBI		n		submis		submitted	
	2015 –	(LODR)		take		sion of		the prior	
	Prior	Regula		n		prior		intimation of	
	Intimations	tion,				intima		board meeting	
		2015				tions		where	
		2020				to the		financial	
						stock		results were	
						excha		approved for	
								the quarter	
						nge		ended 31	
								March 2023	
								to the stock	
								exchange by	
					-			delay of few	
								days.	
								(ii) The listed	
								entity has	
								not	
								submitted	
								the prior	
								intimation of	
								board	
								meeting	
								where	
								financial	
								results were	
								approved for	
								the quarter	
								ended	
								30.09.2023	
						and the street of		to the stock	
					1	ma And		exchange.	

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Reg. 27 of SEBI (LODR)	Reg.	low	No	NA	Wrong	Nil	Date of		
Regulations, 2015 – Other corporate governance requirements	27 of SEBI (LODR) Regula tion, 2015		actio n take n		data submit ted in Corpor ate Gover nance Report		Board Meeting held in the previous quarter ended 30 June 2023 is wrongly reported in the Corporate Governance Report for the quarter ended 30 September		
							2023 to the stock		
Reg. 27 of SEBI (LODR) Regulations, 2015 – Other corporate governance requirements	Reg. 27 of SEBI (LODR) Regula tion, 2015	low	No actio n take n	NA	Non- submis sion of data in Corpor ate Gover nance Report	Nil	The listed entity has failed to mention the date of reappointment of Mr. Rajesh Pant (Nonexecutive Director) in the Corporate Governance Report for the quarters ended 30.09.2023 and 31.12.2023 filed with the stock exchange.		
Reg. 9(1) of SEBI (PIT) Regulations, 201 and Schedule B Code of Conduct	SEBI (PIT) Regula tions, 2015– And Sched ule B	Hig h	No actio n take n	NA	Non closur e of tradin g windo w	Nil	The listed entity had failed to close the trading window for the quarter ended 30		
	Reg. 27 of SEBI (LODR) Regulations, 2015 – Other corporate governance requirements	Other corporate governance requirements Reg. 27 of SEBI (LODR) 27 of Regulations, 2015 — Other corporate governance requirements Reg. 9(1) of SEBI (LODR) Regulation, 2015 Regulations, 2015 Regulations, 2015 Regulations, 2015 Regulations, 2015 Regulations, 2015 Regulations, 2015 SEBI (PIT) Regulations, 2015 Code of Conduct Sched	Other corporate governance requirements Reg. 27 of SEBI (LODR) Regulations, 2015 – Other corporate governance requirements Reg. 9(1) of SEBI (LODR) Regulation, 2015 Regulation, 2015 Regulation, 2015 Regulation, 2015 Regulation, 2015 Regulations, 2015 And Schedule B Code of Conduct Sched	Reg. 27 of SEBI (LODR) requirements Reg. 27 of SEBI (LODR) Regulations, 2015 – (LODR) Other corporate governance requirements Reg. 9(1) of SEBI (LODR) Regulations, 2015 – (10DR) Regulation, 2015 Regulation, 2015 Regulation, 2015 Regulation, 2015 Regulations, 2015 Regulati	Other corporate governance requirements Reg. 27 of SEBI (LODR) 27 of Regulations, 2015 — (LODR) Regulations, 2015— (LODR) Regulation, 2015 Reg. 9(1) of SEBI (LODR) Regulation, 2015 Regulations, 2015 Reg. 9(1) of SEBI (PIT) Regulations, 201 and Schedule B Code of Conduct Reg. 9(1) of SEBI (PIT) Regulations, 2015— (Not take take take take to not take take take take take take not take not take take not	Other corporate governance requirements Reg. 27 of SEBI (LODR) 27 of Regulations, 2015	Other corporate governance requirements Reg. 27 of SEBI (LODR) 27 of Regulations, 2015 - Other corporate governance requirements Reg. 27 of SEBI (LODR) 27 of SEBI (LODR) 4 take Regulations, 2015 - Other corporate governance requirements Reg. 9(1) of SEBI (NPIT) Regulations, 2015 - Regulations, 2015 - Other corporate governance requirements Reg. 9(1) of SEBI (PIT) Regulations, 2015 - Regulations, 201 and Schedule B Code of Conduct Reg. 9(1) of SEBI (PIT) Regulations, 2015 - Reg	Other corporate governance requirements Regula governance requirements 2015 Reg. 27 of SEBI (LODR) CORPORTAGE (LODR) Regulations, 2015 Reg. 27 of SEBI (LODR) CORPORTAGE (LODR) Regulations, 2015 Reg. 27 of SEBI (LODR) CORPORTAGE (LODR) CORPOR	Other corporate governance requirements Regula governance tion, 2015 Reg. 27 of SEBI (LODR) Corporate Governance Report for the quarter ended 30 June 2023 is wrongly reported in the Corporate Governance Report for the quarter ended 30 September 2023 to the stock exchange. Reg. 27 of SEBI (LODR) Corporate Governance Regula tion, 2015 Corporate Governance Regula tion, requirements Regula governance tion, requirements Reg. 2015 Reg. 21 of SEBI (LODR) Corporate Governance Regula tion, requirements Reg. 2015 Reg. 2015 Reg. 21 of SEBI (LODR) Corporate Governance Regula tion, requirements Reg. 2015 Reg. 2015 Reg. 2015 Reg. 2015 Reg. 2015 Reg. 3010 of SEBI (PIT) Reg. 3010 of

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and 30
September
2023 in
respect of
securities to
which such
unpublished
price
sensitive
information
relates.

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

No. requir (Regulation (Regulation (Regula	lines	Regula tion/ Circula r No.	Devi ation s	Action taken by	Type of action	Details of violati on	Fine Amo unt	Observations/ Remarks of the PCS	Manag ement Respo nse	Remarks
(LODF Regul 2015 of securi	ations, - Holding specified ties and holding	Reg. 31(1)(b) of SEBI (LODR) Regula tion, 2015	Low	No action taken	NA	Delay in submis sion of the shareh olding patter n	Nil	The listed entity had filed the intimation of holding of specified securities and shareholding pattern for the quarter ended December 2022 by delay of few days with the stock exchange.	The delay and non-filings with respec t to stock exchange and MCA was taken care of and certain delays was due to improper net conne	

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									experi	
									enced	
									during	
									that	
									time.	
2.	Reg. 44 of SEBI	Reg.	Low	No	NA	Delay	Nil	The listed	The	-
	(LODR)	44(3)		action		in		entity had filed	delay	
	Regulations,	of SEBI		taken		intima		the voting	and	
	2015 –	(LODR)				tion of		results of	non-	
	Meetings of	Regula				filing		Annual	filings	
	Shareholders	tion,				voting		General	with	
	and Voting	2015				Result		Meeting and	respec t to	
	and voting	and				500		Extraordinary	stock	
		Service Service				0.00		The state of the s	excha	
		BSE				XBRL		General	nge	
		Circula				mode.		Meeting held	and	
		r						on 28	MCA	
		DCS/C						September	was	
		OMP/						2022 and 20	taken	
		20/20						March 2023	care of	
		16-17						respectively to	and	
		dated						the stock	certain	
		Januar						exchange by	delays	
		у 18,					-	delay of few	was	
		2018						days.	due to	
		2010						uays.	impro	
									per	
									net	
									conne	
									ctivity	
									experi	
									enced	
									during	
									that	
									time.	
	-								time.	
3.	Reg. 34 of SEBI	Reg.	Low	No	NA	Delay	Nil	The listed	The	2.
٥.	(LODR)	34(1)(2011	action		in		entity had	delay	
				taken		submis		submitted the	and	
	Regulations,	a) of		taken					non-	
	2015 –	SEBI				sion of		annual report	filings	
	Annual Report	(LODR)				annual		to the stock	with	
		Regula				report		exchange by	respec	
		tion,				to the		delay of few	t to	
		2015				stock		days	stock	
						exchan			excha	
				/	arma And As	ge			nge	
				19		13:1	_		and	

4.	Reg. 31 of SEBI (LODR) Regulations, 2015 – Holding of specified securities and shareholding pattern.	Reg. 31(2) of SEBI (LODR) Regula tion, 2015	High	No action taken	NA And Ass	Non mainte nance of promo ter's shareh olding in demat erializ ed form	Nil	Shares held by Mr. Hans Jurgen Wagner* and Knowledge Holdings & Investments Pte. Ltd.* (Promoter and Promoter Group) are not in dematerialized form. *Disclosure under Regulation 30(2) of SEBI (SAST) Regulation 2011, by Mr. Hans Jurgen Wagner and Knowledge Holdings & Investments	MCA was taken care of and certain delays was due to impro per net conne ctivity experi enced during that time. Mr. Hans Jurgen Wagne r and Knowl edge Holdin gs & Invest ments Pte. Ltd. were inform ed to get their shares demat erializ ed by the Compa ny but no comm unicati on is	
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								Pte. Ltd was	receiv
								not made.	ed so
									far
									from
									either
									of
									555.55
				- Augusta					them.
5.	Reg. 29 of SEBI	Reg.	low	No	NA	Delay	Nil	The listed	The
	(LODR)	29 of		action		in		entity had	delay
	Regulations,	SEBI		taken		submis		submitted the	and
	2015 –	(LODR)				sion of		prior	non-
	Prior	Regula				prior		intimations of	
	Intimations	tion,				intima		board meeting where	with
		2015				tions		financial	respec t to
		2013				to the		results were	stock
								approved for	excha
						stock		the quarter	nge
						exchan		ended 30 June	and
						ge		2022, 30	MCA
								September	was
								2022 and 31	taken
								December	care of
								2022 to the	and
								stock	certain
								exchange by	delays
								delay of few	was
				_				days.	due to
									impro
									per
									net
									conne
									ctivity
									experi
									enced
									during
									that
									time
6.	Reg. 27 of SEBI	Reg.	low	No	NA	Wrong	Nil	Date of	Clerica
	(LODR)	27 of		action		data		passing special	lerror
	Regulations,	SEBI		taken		submit		resolution for	
	2015 –	(LODR)				ted in		the	
	Other	Regula				Corpor		appointment	
	corporate							of Mr. Suresh	
	governance	tion,				ate		Vyas and	
	requirements	2015				Gover		composition of	
						nance		Stakeholder	
					na And Asso	Report		and	
				Sharr	- CS.			Relationship	

(LODR Regula 2015 - Other corpor govern requir 8. Reg. 4 (LODR Regula 2015 - Recore Closur	ations, rate nance rements 12 of SEBI R) ations,	Reg. 27 of SEBI (LODR) Regula tion, 2015 Reg. 42 of SEBI (LODR)	low	No action taken	NA	Wrong data submit ted in Corpor ate Gover nance Report	Nil	exchange. Composition of Stakeholder and Relationship Committee is wrongly reported in the Corporate Governance Report for the quarter ended December 2022 to the stock exchange. The listed entity has	Clerica I error	
(LODR Regula 2015 - Record Closur transfe	R) ations, –	42 of SEBI	High	action	NA	5.700000	Nil	entity has	manda	
	er of	Regula tion, 2015				ssion of intima tion of notice of record date		failed to submit the intimation regarding notice of record date of Annual General Meeting and Extraordinary General Meeting held on 28 September 2022 and 20 March 2023 to the stock exchange.	torily requir ed	
(LODR	17 of SEBI R) ations,	Reg. 47 (3) of SEBI	High	No action taken	NA NA And A	Delay in public	Nil	The listed entity had published the notice of	The delay and non-	

	A 1	// 055				T		F. a	£:1:	
	Advertisement	(LODR)				ation		Extraordinary General	filings with	
	in Newspaper	Regula				of			- Section and	
	Publication	tion,				notice		Meeting in the newspaper by	respec t to	
		2015				of		delay of three	stock	
						Extrao		days.	excha	
						rdinar		uays.	nge	
						у			and	
						Gener		l l	MCA	
						al		1	was	
						1,36451			taken	
						Meeti			care of	
						ng in			and	
						the			certain	
						newsp			delays	
						aper			was	
									due to	
									impro	
									per	
									net	
									conne	
									ctivity	
									experi	
									enced	
									during	
									that	
									time.	
10.	Reg. 31 of SEBI	Reg.	High	No	NA	Non	Nil	The listed	The	
	(SAST)	31(4)		action		submis		entity had	delay	
	Regulations,	of SEBI		taken		sion of		failed to	and	
	2011-	(SAST)		333,1132,1		yearly		submit the	non-	
	Disclosure of	100				disclos		yearly	filings	
	encumbered	Regula						disclosure of		
	shares	tions,				ure of		no	respec	
		2011				no		encumbrance	t to	
						encum		made during		
						brance		the year for		
						made		Mrs. Veena	nge	
						during		Kanodia, SNK		
						the		Electronics	MCA	
								Private Limited	was	
						year to		and other		
						the		immediate	care of	
						stock		relatives to the	and	
						exchan		stock	certain	
						ge		exchange.	delays	
									was	
									due to	

11.	Reg. 9(1) of	SEBI	High	No	NA	Non	Nil	The listed	impro per net conne ctivity experi enced during that time. Now	
	SEBI (PIT) Regulations, 201 and Schedule B Code of Conduct	(PIT) Regula tions, 2015– And Sched ule B		action taken		closur e of tradin g windo w		entity had failed to close the trading window for the quarter ended 30 June 2022, 30 September 2022 and 30 December 2022 in respect of securities to which such unpublished price sensitive information relates.	being compli ed with	

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.

Kaushamb

For Munish K. Sharma & Associates LLP

Company Secretaries

FRN: P2004UP077300

CS Aditya Jain

Partner M. No.: F11835

C.P. No. 25426

UDIN: F011835F000470216

Place: Ghaziabad Date: 28.05.2024