



Padmalaya Telefilms Limited

CIN No.L92 111AP1991PLC013222

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Date: 9th November 2024

To
The Manager,
Dept. of Corporate Services,
BSE LTD ,
P J TOWRS, Mumbai

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the **Financial Year 2023-24**
Ref: Reg: 24A of SEBI (LODR) Regulations 2015, read with -
SEBI Circular No: CIR/CFD/CMD1/27/2019 dated February 08, 2019

Company Name: M/s. PADMALAYA TELEFILMS LTD (Scrip Code: 532350)
For the Financial Year 2022-23

With reference to the captioned subject, and above referred Regulation 24A of SEBI (LODR) Regulations 2015, read with - SEBI Circular No: CIR/CFD/CMD1/27/2019 dated February 08, 2019, we hereby submit Annual Secretarial Compliance Report for the **Financial Year 2023-24** of **M/s. PADMALAYA TELEFILMS LIMITED**

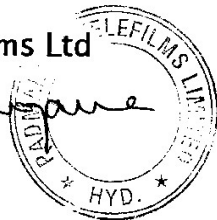
This is for your information and record.

Thanking you,

For Padmalaya Telefilms Ltd

R. N. S. Sujan

Compliance officer





SECRETARIAL COMPLIANCE REPORT OF PADMALAYA TELEFILMS LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Padmalaya Telefilms Limited** (hereinafter referred as 'the listed entity') having its Registered Office at H.No.8-3-222/1/23, Madhuranagar, Yusufguda, Hyderabad, Telangana- 500038, India, 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 31st March 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, Puttaparthi Jagannatham & Co., a firm of Practicing Company Secretaries, Hyderabad, have examined:

- a) all the documents and records made available to us and explanation provided by **Padmalaya Telefilms Limited** ("the listed entity") except for the Statutory Meeting Minutes, Registers and other related documents.
- b) the filings/ submissions made by the listed entity to the stock exchanges {The acknowledgements were given for the filings made}.
- c) Website of the listed entity, {Not Active}
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the financial 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; **Not Applicable during the period under review;**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not Applicable during the period under review;**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable to the Company during the review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the period under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during the review period;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021; **Not Applicable to the Company during the review period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that during the review period.



(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	Reg 33	Regulation 33, SEBI (LODR) 2015	The Company has not Submitted the Financial results for the quarter ended 31 st December 2023. Also, a mail has been received in 15.03.2024.	BSE	Fine	Delay in filing the financial results for the quarter ended 31 st December 2023.	17700	The Company has made a late submission for the quarter ended 31 st December 2023	The Company has filed the financial results for the quarter ended 31 st December 2023 and is in the process of paying the fees shortly.	Fine is still not paid by the Company.



2	13(3)	Regulation 13(3) SEBI (LODR) 2015	<p>The Company has received a mail dated 28.08.2023 from BSE Ltd for pay fine Rs. 10,620/-for the non-compliance for the Quarter ended June 30, 2023.</p> <p>The Company has received a mail dated 14.02.2024 and 01.03.2024 from BSE Ltd for pay fine Rs. 44,840/-for the non-compliance for the Quarter ended December 31, 2023.</p> <p>The Company has received a mail dated 30.05.2024 from BSE Ltd for pay fine Rs. 7080/- for the non-compliance for the Quarter ended</p>	BSE	Fine	<p>Delay in filing the Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended June 30,2023.</p> <p>Till the fourth quarter Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended December 31 ,2023 was not submitted with the BSE.</p> <p>Till the fourth quarter Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended March 31, 2024 was</p>	62540	<p>It was observed that the company has not submitted the requirements to the BSE and fine was imposed by the stock exchange</p> <p>Late filings were made in August 2023 and March 2024 and there has been a significant delay in submitting the documents.</p> <p>Delay for more than 3 Months.</p>	<p>The Company delayed the intimation and is in the process of paying the fees shortly.</p>	<p>Fine is still not paid by the Company.</p>
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			March 31, 2024.			not submitted with the BSE.				
3	23(9)	Regulation 23(9) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 28.06.2024 from BSE Ltd to pay the fine of Rs. 1,71,100 for non-compliance.	BSE	Fine	Till the fourth quarter company has not filed the disclosure of related party transactions on a consolidated basis to the BSE.	1,71,100	It was observed that the company has not complied with said regulation till the date of issue of this Report.	The Company has submitted the Reg 23- XBRL in the month of June 2024.	Fine is still not paid by the Company.
4	6 (1)	Regulation 6(94 of SEBI (LODR) Regulations 2015	The Company has received a mail dated 06.07.2023 ,17.12.2023 and 12.06.204 from BSE Ltd to pay the fine of Rs. 107,380 for non-compliance.	BSE	Fine	Till the fourth quarter company has not appointed Company Secretary and not filed the disclosure to the BSE.	107,380	It was observed that the company has not complied with said regulation till the date of issue of this Report.	The Company has not appointed a Company Secretary.	The Non-Compliance still continues as on the date of issue of this report.
5	27(2)	Regulation 27(2) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 22.05.2024 from BSE Ltd for non-compliance and pay fine of Rs. 70800.	BSE	Fine	Till the fourth quarter company Not submitted the Corporate Governance for the Quarter ended March 31, 2024.	14160	It was observed that the company has not submitted till the fourth quarter and was submitted in May 2024.	The Company filed the same in the month of May 2024 and there has been a significant delay in filing the said compliance.	Fine is still not paid by the Company.
6	27(2)	Regulation 27(2)	The Company has received a mail dated 06.07.2023	BSE	Fine	The company has Not submitted the Corporate	21240	It was observed that the company had late filed the CG report. It	The Company filed the same in the month of August	Fine is still not paid by



		of SEBI (LODR) Regulations 2015	and 21.08.2023 from BSE Ltd for non-compliance.			Governance for the Quarter ended June 30, 2023.		was submitted in August 2023.	2023 and there has been a significant delay in filing the said compliance.	the Company.
7	27(2)	Regulation 27(2) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 22.02.2024 from BSE Ltd for non-compliance and pay fine of Rs. 70800.	BSE	Fine	Till the fourth quarter company Not submitted the Corporate Governance for the Quarter ended December,31 2023.	70800	It was observed that the company has not submitted till the fourth quarter and was submitted in May 2024.	The Company filed the same in the month of May 2024 and there has been a significant delay in filing the said compliance.	Fine is still not paid by the Company.
8	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 11.08.2023 & 28.08.2023 from BSE Ltd for pay fine of Rs. 23,600/-for the non-compliance.	BSE	Fine	Shareholding Pattern for the Quarter ended June 30, 2023, was not submitted.	23600	The shareholding pattern was not filed within 30 days of the end quarter and was filed in August 2023.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
9	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 14.02.2024 from BSE Ltd for pay fine of Rs. 51,920/-for the non-compliance.	BSE	Fine	Non-Submission of Shareholding Pattern for the Quarter ended Dec 31, 2023, within due date	51920	The shareholding pattern was not filed within 30 days of the end quarter.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
10	31(1)	Regulation	The Company has received a mail	BSE	Fine	Non-Submission of Shareholding	14160	The shareholding pattern was not filed	The Company delayed the	Fine is still not paid by



		31(1) of SEBI (LODR) Regulations 2015	dated 14.05.2024 and 30.05.2024 from BSE Ltd for pay fine of Rs. 14,160/-for the non-compliance.			Pattern for the Quarter ended March 31, 2024, within the due date		within 30 days of the end quarter.	intimation and is in the process of paying the fees shortly.	the Company.
11	17(1A)	Regulation 17(1A) of LODR Regulations	The Company has received a mail dated 06.07.2023 from BSE Ltd pay fine of Rs. 66,080/- for the non-compliance.	BSE	Fine	Non-compliance in continue a non-executive director who is over 75 years old unless the company's members pass a special resolution	66080	Not yet pass the Special Resolution.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.

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

Sr. No	Compliance Requirement (Regulations/Circulars/Guidelines including	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
					Advisory/Clarification/ Fine/ Show Cause Notice/ Warning, etc.					



	specific clause)									
1	Reg 33	Regulation 33, SEBI (LODR) 2015	The Company has not Submitted the Financial results for the quarter ended 31 st December 2022. Also, a mail has been received in 15.02.2023.	BSE	Fine	Delay in filing the financial results for the quarter ended 31 st December 2022.	112100	The Company has made a late submission for the quarter ended 31 st December 2022	The Company has filed the financial results for the quarter ended 31 st December 2022 and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
2	Reg 29(2)/29 (3)	Regulation 29(2)/29 (3), SEBI (LODR) 2015	The Company has received a mail dated 31.03.2023 from BSE Ltd for pay fine Rs. 11800/- for the Non – compliance.	BSE	Fine	Delay in furnishing prior intimation about the meeting of the board of directors for Quarterly results.	11800	It is observed that the company has not submitted the intimation of the Board Meeting to the Stock exchange and fine was imposed by the BSE.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
3	42 & 62	Regulation 42 & 62, SEBI (LODR) 2015	The Company has received a mail dated 11.03.2023 from BSE Ltd for non-compliance	BSE	-	Non-submission of information required under Regulation 46 and 62 of SEBI (LODR) Regulations 2015 on BSE Listing Centre	-	It was observed that the website of the company was not up to date and the company has not submitted the requirement under Regulation 42 till the date of report.	The Company is in the process of updating the website.	The website is still not updated.



4	13(3)	Regulation 13(3) SEBI (LODR) 2015	<p>The Company has received a mail dated 01.02.2023 from BSE Ltd for pay fine Rs. 25,960/-for the non-compliance for the Quarter ended December 31, 2022</p>	BSE	Fine	<p>Till the fourth quarter Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended December 31, 2022 was not submitted with the BSE.</p>	25960	<p>It was observed that the company has not submitted the requirements to the BSE and fine was imposed by the stock exchange</p>	<p>The Company delayed the intimation and is in the process of paying the fees shortly.</p>	<p>Fine is still not paid by the Company.</p>
			<p>The Company has received a mail dated 16.08.2022 from BSE Ltd for pay fine Rs. 25,960/-for the non-compliance for the Quarter ended June 30, 2022.</p>	BSE	Fine	<p>Till the fourth quarter Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended June 30, 2022 was not submitted with the BSE.</p>	30680	<p>Ateh filings were made in August 2023 and there has been a significant delay in submitting the documents. Delay for more than 9 Months.</p>		
5	3(5)	Regulation 3(5) of SEBI (PIT) Regulations 2015.	<p>The Company has received a mail dated 29.08.2022 & 21.10.2022 from BSE Ltd for non-compliance.</p>	BSE	Notice	<p>Till the fourth quarter of SDD Compliance Certificate for the Quarter Ended June 30, 2022 was not submitted by the Company</p>	-	<p>It was observed that the company has not compliant with said regulation till date of issue of this Report and there is no SDD in place.</p>	<p>The Company is in the process of procuring the software and will comply soon.</p>	<p>Non-Compliance still going.</p>



6	3(5)	Regulation 3(5) of SEBI (PIT) Regulations 2015.	The Company has received a mail dated 19.01.2023 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter of the SDD Compliance Certificate for the Quarter Ended September 30, 2022, was not submitted by the Company	-	It was observed that the company has not complied with said regulation till date of issue of this Report and there is no SDD in place.	The Company is in the process of procuring the software and will comply soon.	Non-Compliance still going.
7	3(5)	Regulation 3(5) of SEBI (PIT) Regulations 2015.	The Company has received a mail dated 23.03.2023 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter of the SDD Compliance Certificate for the Quarter Ended September 30, 2022, was not submitted by the Company	-	It was observed that the company has not complied with said regulation till date of issue of this Report and there is no SDD in place.	The Company is in the process of procuring the software and will comply soon.	Non-Compliance still going.
8	23(9)	Regulation 23(9) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 27.12.2022 from BSE Ltd to pay the fine of Rs. 1,65,200 for non-compliance.	BSE	Fine	Till the fourth quarter company has not filed the disclosure of related party transactions on a consolidated basis to the BSE.	165200	It was observed that the company has not complied with said regulation till the date of issue of this Report.	The Company has submitted the Reg 23- XBRL in the month of August 2023.	Fine is still not paid by the Company.
9	34	Regulation 34 of SEBI (LODR) Regulations 2015	The Company has received a mail dated 21.10.2022 from BSE Ltd for pay fine of Rs. 30,680/- for non-compliance.	BSE	Fine	Non-submission of the Annual Report within the period prescribed under this regulation	30680	It was observed that the company has not submitted the Annual Report in XBRL mode.	There has been a late submission of the said compliance.	Fine is still not paid by the Company.



10	Reg 40(9) & (10)	Regulation 40(9) & 40(10) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 07.06.2022 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter Certificate under Reg.40(9), (10) of SEBI (LODR) Regulations 2015 for the Year ended March 31, 2022, was not submitted by the Company on BSE.	-	It was observed that the company has not submitted the Regulation 40(9) & (10) till the fourth quarter and was only submitted on 7 th August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
11	27(2)	Regulation 27(2) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 23.01.2023 from BSE Ltd for non-compliance.	BSE	Fine	Till the fourth quarter, the company has Not submitted the Corporate Governance for the Quarter ended December 31, 2022.	68440	It was observed that the company had not filed the CG report and non-compliance was continued till 31.03.2023. It was only submitted in August 2023.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
12	27(2)	Regulation 27(2) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 03.08.2022 & 03.02.2023 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter company Not submitted the Corporate Governance for the Quarter ended June 30, 2022.	-	It was observed that the company has not submitted till the fourth quarter and was only submitted in August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
13	76	Regulation 76 of SEBI (Depositaries & Participants)	The Company has received a mail dated 05.05.2022 from BSE Ltd for non-compliance.	BSE	Notice	Non-Submission of Reconciliation of Share Capital Audit Report for the quarter ended March 31, 2022.	-	It was observed that the company has not submitted the SAR till the fourth quarter and was only submitted in August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---



		Regulations 2018								
14	76	Regulation 76 of SEBI (Depositaries & Participants) Regulations 2018	The Company has received mail dated 31.01.2023 & 03.02.2023 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter company has not submitted the Reconciliation of Share Capital Audit Report for the quarter ended Dec 31, 2022.	--	It was observed that the company had not filed the SAR report and non-compliance was continued till 31.03.2023	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
15	76	Regulation 76 of SEBI (Depositaries & Participants) Regulations 2018	The Company has received a mail dated 04.08.2022 from BSE Ltd for non-compliance.	BSE	Notice	Non-Submission of Reconciliation of Share Capital Audit Report for the quarter ended June 30, 2022.	--	It was observed that the company had not filed the SAR report and non-compliance was continued till 31.03.2023	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
16	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 30.01.2023 from BSE Ltd for pay fine of Rs. 51,920/-for the non-compliance.	BSE	Fine	Till the fourth quarter of Shareholding Pattern for the Quarter ended Dec 31, 2022, was not submitted.	51920	The shareholding pattern was not filed within 30 days of the end quarter and was filed in August 2023.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.



17	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 02.08.2022 from BSE Ltd for non-compliance.	BSE	-	Non-Submission of Shareholding Pattern for the Quarter ended June 30, 2022, within due date	-	The shareholding pattern was not filed within 30 days of the end quarter .	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
18	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 05.05.2022 from BSE Ltd for non-compliance.	BSE	-	Non-Submission of Shareholding Pattern for the Quarter ended March 31, 2022, within the due date	-	The shareholding pattern was not filed within 30 days of the end quarter.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
19	31(1)	Regulation 31(1) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 16.08.2022 from BSE Ltd for non-compliance.	BSE	Fine	Non-Submission of Shareholding Pattern for the Quarter June 2022.	61360	The shareholding pattern was not filed within 30 days of the end quarter and was filed in August 2023.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
20	7(2)	Regulation 7(2) of PIT Regulations	The Company has received a mail dated 12.09.2022 from BSE Ltd for non-compliance.	BSE	Notice	Non-Submission of information relating to PAN of Promoters, members of the Promoter Group and Designated Persons.	---	Not yet submitted.	The Company is in the process of collating the data for submission.	---



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 Standard The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	No	Board Meeting Minutes were not signed and other documents were not presented to comment on the same.
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 the board of directors of the listed entities.• All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI.	No	None
3	Maintenance and disclosures on the 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.	No	Website not updated with relevant disclosures and policies as required under the SEBI LODR.
4	Disqualification of Director: None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity.	Yes	None



5	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure Requirements of material as well as other subsidiaries.	NA	No subsidiaries exist as on date.
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per the Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	No	But the same was not produced to us in this year.
7	Performance Evaluation: The listed entity has conducted performance evaluations of the Board, Independent Directors, and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	None
8	Related Party Transactions: (a) The listed entity has obtained prior approval of the Audit Committee for all Related party transactions; (b) In case no prior approval obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes	None
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.	No	Detailed above*
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None



11	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 paragraph herein (**).	Yes	Yes, BSE has issued mails for violating regulations as prescribed and detailed above*
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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	NA
13	No additional non-compliance was observed for any SEBI regulation/circulars/guidance note etc.	No	Yes, BSE has issued mails for violating regulations as prescribed and detailed above*

**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

Assumptions & Limitations 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 the 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.

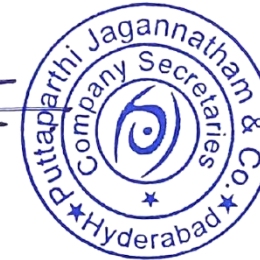
**Note: The Company has not appointed a Company Secretary till the date of Issue of this Certificate.*

Note: The management of the Company has approached us for the Reg 24 Certificate for the year ended 31.03.2024 on 02.09.2024. As per the information of the RTA and management made available to us, we are hereby issuing the Reg 24 Certificate for the year ended 31.03.2024.

Place: Hyderabad

Date: 05th September 2024

**For Puttaparthi Jagannatham & Co.
Company Secretaries**



**CS Navajyoth Puttaparthi
Partner**

FCS No: 9896; C P No: 16041

Peer Review Certificate No. 1158/2021

UDIN: F009896F001146020