

**Secretarial Compliance Report of
Country Club Hospitality & Holidays Limited
(CIN: L70102TG1991PLC012714)
for the Financial Year ended 31st March, 2026.**

We, R & A Associates, Company Secretaries have examined:

- (a) All the documents and records made available to us, and explanation provided by **Country Club Hospitality & Holidays Limited** ("the listed entity" or "Company")
- (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 report,

for the financial year ended **31st March, 2026** ("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; [*Hereinafter to be referred as "SEBI (LODR) Regulations, 2015"*]
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (*Not applicable during the Review Period*)
- (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 during the Review Period*)



- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *(Not applicable during the Review Period)*
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *(Not applicable during the Review Period)*
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; *[Hereinafter to be referred as "SEBI (PIT-) Regulations, 2015"]*
- (h) other regulations as applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:



- I. (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/ CircularNo.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange(s), in the manner specified by the Board or the recognized stock exchange(s).	Regulation 14 of SEBI (LODR) Regulations, 2015.	There was delay of 31 days in payment of Annual Listing Fees to both the Stock Exchanges i.e. National Stock Exchange (NSE) & Bombay Stock Exchange (BSE)	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation of Regulation 14 of SEBI (LODR) Regulations, 2015	Nil	Delay in payment of Annual Listing Fees payable to NSE & BSE as required under 14 of SEBI (LODR) Regulations, 2015.	The Management of the Company acknowledged the delay and noted to comply the same henceforth.	-
2.	The Board of Directors shall periodically review compliance reports pertaining to all laws applicable to the listed entity, prepared by the listed entity as well as steps taken by the listed entity to rectify instances of non-compliances.	Regulation 17(3) of SEBI (LODR) Regulations, 2015.	There were instances where the Board of Directors has not periodically reviewed the Compliance Reports pertaining to all Laws applicable	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation of Regulation 17(3) of SEBI (LODR) Regulations, 2015	Nil	The Board has not periodically reviewed the Compliance Reports pertaining to all laws applicable to the listed	The Management of the Company acknowledged the non-compliance and noted to comply the same henceforth.	-



[illegible]

4.	Reg 36 (1): The listed entity shall send the annual report in the following manner to the shareholders: (a) Soft copies of full annual report to all those shareholder(s) who have registered their email address(es) either with the listed entity or with any depository; (b) A letter providing the web-link, including the exact path, where complete details of the Annual Report is available to those shareholder(s) who have not so registered; (c) Hard copy of full annual 388[report] to those shareholders, who request for the same.	Regulation 36 (1) (b) of SEBI (LODR), Regulation, 2015	The Listed Entity has not complied with the provisions of Regulation 36(1)(b) of the SEBI (LODR) Regulations, 2015, with respect to dispatch of the letter containing the web-link of the Annual Report to shareholders whose email addresses were not registered.	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation of Regulation 36 (1) (b) of SEBI (LODR), Regulation, 2015	NIL	The Listed Entity has not complied with the provisions of Regulation 36(1)(b) of the SEBI (LODR) Regulations, 2015, with respect to dispatch of the letter containing the web-link of the Annual Report to shareholders whose email addresses were not registered.	The Management of the Company acknowledged the non-compliance and noted to comply the same henceforth.
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5.	Regulation 47(1) of the SEBI (Listing Obligations and Disclosures Requirements), 2015 relating to publication of advertisement in newspapers containing the Quick Response (QR) Code and details of the webpage where complete financial results are accessible to investors.	Regulation 47(1) of the SEBI (LODR) Regulations, 2015	The Company did not publish the Quick Response (QR) Code in the newspaper advertisement relating to the financial results for Quarter ended 31 st March, 2025, 30 th September, 2025 and 31 st December, 2025.	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation of Regulation 47(1) of the SEBI (LODR) Regulations, 2015	NIL	The Company has not complied with the provisions of Regulation 47(1) of the SEBI (LODR) Regulations, 2015, as the newspaper publication of financial results did not contain the prescribed Quick Response (QR) Code for Quarter ended 31 st March, 2025, 30 th September, 2025 and 31 st December, 2025.	The Management of the Company acknowledged the non-compliance and noted to comply the same henceforth.
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6.	Regulation 46 (2) of SEBI (LODR), Regulation, 2015: The listed entity shall disseminate the following information under a separate section on its website: a) details of its business; b) c) d) (za) Employee Benefit Scheme Documents, excluding commercial secrets and such other information that would affect competitive position of the listed entity, framed in terms of the provisions of Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021	Regulation 46 (2) of SEBI (LODR), Regulation, 2015.	Certain disclosures/information required to be disseminated under a separate section on the website of the Company were not available on the website.	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation Regulation 46 (2) of SEBI (LODR), Regulation, 2015.	NIL	The Company has ensured complete compliance with Regulation 46(2) of the SEBI (LODR) Regulations, 2015, as certain prescribed disclosures were not made available/ disseminated under the separate section of the Company's website.	The Management of the Company acknowledged the non-compliance and noted to comply the same henceforth.	
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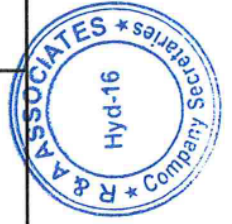
7.	Regulation 8 (1) of SEBI (PIT), Regulation, 2015: The board of directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to these regulations, without diluting the provisions of these regulations in any manner.	Regulation 8 (1) of SEBI (PIT), Regulation, 2015	The Company has not complied with Regulation 8(1) of the SEBI (PIT) Regulations, 2015, as the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information was not published on the Company's official website in accordance with the requirements.	As per the information provided by the Company, no action was taken by any of the Authorities.	NA	Violation of Regulation 8(1) of SEBI (PIT), Regulation, 2015	Nil	The Listed Entity has not complied with Regulation 8(1) of the SEBI (PIT) Regulations, 2015, as the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information was not published on the Company's official website in accordance with the requirements of the said Regulations.	The Management of the Company has acknowledged the delay and noted to comply the same henceforth.
8.	(5) The board of directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider	Company do not have any system of Structured Digital database as required	As per the information provided by the Company,	NA	Violation of Regulation 3(5) & 3(6) SEBI (Prohibition	Nil	Company do not have any system of Structured Digital	The Management of the Company acknowledged the non-



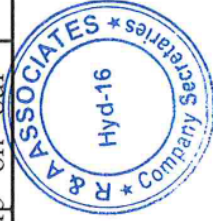
ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.	Trading) Regulations, 2015.	under Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	no action was taken by any of the Authorities		of Insider Trading) Regulations, 2015.	database as required under Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	compliance and noted to enter into contract with the SDD Service Provider.
(6) The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall							



	(LODR) Regulations, 2015.					fees to the exchanges and the same being paid subsequently, further action is not contemplated.	
2.	The Board has not periodically reviewed the Compliance Reports pertaining to all laws applicable to the listed entity and no steps has been taken to rectify instances of non-compliances as required under Regulation 17(3) of the SEBI (LODR) Regulations, 2015.	31 st March, 2025	Regulation 17(3) of SEBI (LODR) Regulations, 2015.	Violation of Regulation 17(3) of SEBI (LODR), Regulations, 2015		The Listed Entity is trying to take all adequate measures to periodically review the Compliance Reports pertaining to all Laws applicable to the Company and adequate steps to rectify instances of non-compliances.	



3.	Delay of 18 days in submission of Integrated Filing-Governance for the quarter ended 31 st December, 2024 as required under Regulation 13(3) and Regulation 27(2)(a) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD-PoD2/CIR/P/2024/185 dated 31 st December, 2024.	31 st March, 2025	Regulation 13(3) and Regulation 27(2)(a) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD-PoD2/CIR/P/2024/185 dated 31 st December, 2024	Violation of Regulation 13(3) and 27(2)(a) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD-PoD2/CIR/P/2024/185 dated 31 st December, 2024:	Violation being delay in submission to the exchanges, further action by the Company is not contemplated. However, the Listed Entity has filed both the Corporate Governance Report under Regulation 27(2)(a) and Investors Grievance Report under Regulation 13(3) separately in-time but not integrated report.	
4.	The Company is unable to provide the copies of Minutes of the Board Meeting of its Unlisted Subsidiaries up on our	31 st March, 2025	Regulation 24(3) SEBI (LODR) Regulations, 2015	Violation of Regulation 24(3) SEBI (LODR) Regulations	The Listed Entity is taking all adequate	



	verification.					measures to arrange copies of Minutes of the Board Meeting of its Unlisted Subsidiaries.	
5.	Delay of 15 days in submission of the pdf copy of Secretarial Compliance Report to BSE for the Financial Year ended 31 st March, 2024. However, the XBRL of Secretarial Compliance Report was filed with in the due date to BSE.	31 st March, 2025	Regulation 24A(2) SEBI (LODR) Regulations, 2015	Violation of Regulation 24A(2) SEBI (LODR) Regulations, 2015		Violation being delay in submission to the exchanges, further action by the Company is not contemplated.	
6.	Letter of Resignation of Ms. Madhavi Thyagaraj as Independent Director was not submitted to both the Stock Exchanges pursuant to Reg 30 read with sub-para 7B of Para A of Part A of Schedule-III and SEBI Circular no. SEBI/ HO/CFD/CFDPoD 1/P/CIR/2023/123 dated July 13, 2023	31 st March, 2025	Reg 30 read with sub-para 7B of Para A of Part A of Schedule-III and SEBI Circular no. SEBI/ HO/CFD/CFDPoD 1/P/CIR/2023/123 dated July 13, 2023	Violation of Reg 30 read with sub-para 7B of Para A of Part A of Schedule-III and SEBI Circular no. SEBI/ HO/CFD/CFDPoD1/P/CI R/2023/123 dated July 13, 2023		The Company is yet to submit the same with the Stock Exchanges.	



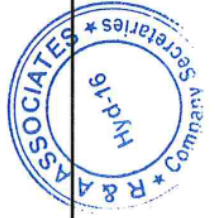
	HO/CFD/CFDPoD1/P/ CIR/2023/123 dated July 13, 2023					
7.	Delay of 18 days in submission of Integrated Filing-Finance for the quarter ended 31st December, 2024 as required under Regulation 23(9), 32(1), 30 r/w section V-B of the Master Circular, Reg 33(3) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD /CFD-PoD2/CIR/P/2024/185 dated 31st December, 2024.	31 st March, 2025	Reg 23(9), Reg 32(1) Reg. 30 r/w section V-B of the Master Circular 33(3) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD /CFD-PoD2/CIR/P/2024 /185 dated 31st December, 2024.	Violation of Regulation 23(9), 32(1), 30 r/w section V-B of the Master Circular, Reg 33(3) of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. SEBI/HO/CFD /CFD-PoD2/CIR/P/2024/185 dated 31st December, 2024.	Violation being delay in submission to the exchanges, further action by the Company is not contemplated. However, the Listed Entity has filed both the Un-audited Financial Results under regulation 33(3) and Disclosure of Related Party Transactions under Regulation 23(9) separately in-time but not integrated Filing-Finance.	
8.	Delay in submission of	31 st March, 2025	Regulation 40 (9) &	Violation of Regulation 40(9)	Violation being	



	Certificate from Practicing Company Secretary for the Financial year ended 31 st March, 2024 to both Stock Exchanges.		(10) of SEBI (LODR) Regulations, 2015	& (10) of SEBI (LODR) Regulations, 2015	delay in submission to the exchanges, further action by the Company is not contemplated.	
9.	Company do not have any system of Structured Digital database as required under Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	31 st March, 2025	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Violation of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	The Listed Entity have made arrangements with the Service providers to maintain the system of structured digital database.	
10.	Delay of 1 day in advertisement of notices of 33 rd AGM given to shareholders in the newspaper as required under Reg 47(1) (d) and (3) of SEBI (LODR) Regulations, 2015	31 st March, 2025	Reg 47(1) (d) and (3) of SEBI (LODR) Regulations, 2015	Violation of Reg 47(1) (d) and (3) of SEBI (LODR) Regulations, 2015	Violation being delay in submission to the exchanges, further action by the Company is not contemplated.	
11.	The Board has not	31 st March, 2024	Regulation 17(3) of	Violation of Regulation	The Listed	The Listed



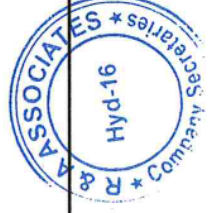
	periodically reviewed the Compliance Reports pertaining to all laws applicable to the listed entity and no steps has been taken to rectify instances of non-compliances as required under Regulation 17(3) of the SEBI LODR Regulations.		SEBI (LODR), Regulations, 2015	17(3) of SEBI (LODR), Regulations, 2015	Entity is trying to take all adequate measures to periodically review the Compliance Reports pertaining to all Laws applicable to the Company and adequate steps to rectify instances of non-compliances.	Entity has still not taken any proper action to periodically review the Compliance Reports pertaining to all Laws applicable to the Company
12.	The Company is unable to provide the copies of Minutes of the Board Meeting of its Unlisted Subsidiaries up on our verification.	31 st March, 2024	Regulation 24(3) SEBI (LODR) Regulations, 2015	Violation of Regulation 24(3) SEBI (LODR) Regulations	The Listed Entity is taking all adequate measures to arrange copies of Minutes of the Board Meeting of its	The Listed Entity is yet to arrange copies of Minutes of the Board Meeting of its Unlisted Subsidiaries.



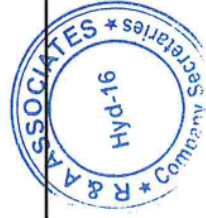
					Unlisted Subsidiaries.	
13.	None of the disclosures required under this Regulation are found in the website of the Company as on date of this report.	31 st March, 2024	Regulation 46 of SEBI (LODR) Regulations, 2015	Violation of Regulation 46 of SEBI (LODR) Regulations, 2015	The Listed Entity has relocated all the disclosures and now all the disclosures specified Regulation 46 of SEBI (LODR) Regulations, 2015 are being displayed and maintained.	The listed entity is yet to disclose few its in the website.
14.	Company do not have any system of Structured Digital database as required under Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	31 st March, 2024	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Violation of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	The Listed Entity have made arrangements with the Service providers to maintain the system of	The Listed Entity is yet to maintain the system of structured digital database in conformity of Regulation



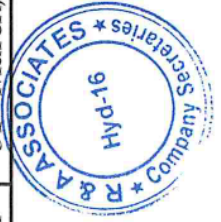
					structured digital database.	3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015
15.	The Company has not submitted Structural Digital Data base Compliance Certificate to both the Stock Exchanges i.e., NSE and BSE for the quarters ended 31 st March, 2023, 30 th June, 2023, 30 th September, 2023 and 31 st December, 2023	31 st March, 2024	BSE Circular No. 20230329-20 dated: 29 th March, 2023 NSE Circular Ref. No: NSE/CML/25 dated March 29, 2023	Failure to comply with the circulars issued by NSE and BSE	The Listed Entity is yet to submit the Structural Digital Data base Compliance Certificate to both the Stock Exchanges i.e., NSE and BSE for the quarters ended 31 st March, 2023, 30 th June, 2023, 30 th September, 2023 and 31 st December, 2023	The Listed Entity is yet to submit the Structural Digital Data base Compliance Certificate to both the Stock Exchanges i.e., NSE and BSE for the quarters ended 31 st Mar, 2023, 30 th Jun, 2023, 30 th Sep, 2023 and 31 st Dec, 2023



16.	The Board has not periodically reviewed the Compliance Reports pertaining to all laws applicable to the listed entity and no steps has been taken to rectify instances of non-compliances as required under Regulation 17(3) of the SEBI LODR Regulations.	31 st March, 2023	Regulation 17(3) of SEBI (LODR), Regulations, 2015	Violation of Regulation 17(3) of SEBI (LODR), Regulations, 2015	2023 The Listed Entity is trying to take all adequate measures to periodically review the Compliance Reports pertaining to all Laws applicable to the Company and adequate steps to rectify instances of non-compliances.	The Listed Entity has still not taken any proper action to periodically review the Compliance Reports pertaining to all Laws applicable to the Company
17.	Company does not have adequate system of structured digital database which is in conformity of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading)	31 st March, 2023	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Violation of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	The Listed Entity have made arrangements with the Service providers to maintain the	The Listed Entity is yet to maintain the system of structured digital database in conformity of



	Regulations, 2015.					system of structured digital database.	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
18.	There were instances when the Board of Directors has not periodically reviewed the Compliance Reports pertaining to all Laws applicable to the Company and steps taken to rectify instances of non-compliances as required under Regulation 17(3) of the SEBI LODR Regulations.	31 st March, 2022	Regulation 17(3) of SEBI (LODR), Regulations, 2015	Violation of Regulation 17(3) of SEBI (LODR), Regulations, 2015	The Listed Entity is trying to take all adequate measures to periodically review the Compliance Reports pertaining to all Laws applicable to the Company and adequate steps to rectify instances of non-compliances.	The Listed Entity has still not taken any proper action to periodically review the Compliance Reports pertaining to all Laws applicable to the Company	
19.	There was an instance of	31 st March, 2021	Regulation 23(9) of	Violation of Regulation	The Company	The Company	



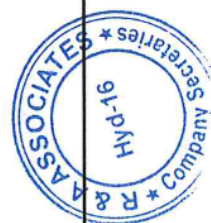
	non-submission of details of Related Party Transactions to Stock Exchanges for the Half Year ended 31 st March, 2020		SEBI (LODR), 2015	23(9) of SEBI (LODR), 2015	is yet to submit the same with the Stock Exchanges.	is yet to submit the same with the Stock Exchanges.
20.	There was an instance of non-submission of Annual Secretarial Compliance Report for the financial year ended 31 st March, 2020 as required under Regulation 24A of SEBI (LODR), 2015 read with SEBI Circular CIR/CFD/ CMD1/ 27/ 2019 dated 08 th February, 2019.	31 st March, 2021	Regulation 24A of SEBI (LODR), 2015 read with SEBI Circular CIR/CFD/ CMD1/ 27/ 2019 dated 08 th February, 2019.	Violation of Regulation 24 A of SEBI (LODR), 2015	The Company is yet to submit the same with the Stock Exchanges.	The Company is yet to submit the same with the Stock Exchanges.
21.	There was an instance of non-disclosure of reason of resignation in respect of disclosures made to Stock Exchanges regarding Resignation of Company Secretary on 25 th August, 2020, as	31 st March, 2021	Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/ 4/2015 dated 9 th September, 2015	Violation of Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/ CMD/4/ 2015 dated 9 th September, 2015	The Company is yet to submit the same with the Stock Exchanges.	The Company is yet to submit the same with the Stock Exchanges.



	required under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/4/2015 dated 9th September, 2015								
22.	There was an instance of non-disclosure of Brief Profile details in respect of disclosures made to Stock Exchanges regarding Appointment of Company Secretary on 05th September, 2020, as required under Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/4/2015 dated 9th September, 2015	31st March, 2021	Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015:	Violation of Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9th September, 2015	The Company is yet to submit the same with the Stock Exchanges.	The Company is yet to submit the same with the Stock Exchanges.			The Company is yet to submit the same with the Stock Exchanges.
23.	The Company is yet to submit the details of resignation of Mr.	31st March, 2021	Regulation 30 of SEBI (LODR) Regulations, 2015:	Violation of Regulation 30 of SEBI (LODR) Regulations, 2015 read	The Company is yet to submit the	The Company is yet to submit the			The Company is yet to submit the



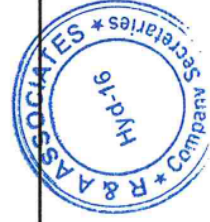
	Venkata Ratna Kishore, Independent Director w.e.f. 18 th April, 2020 to the Stock Exchanges in line with Schedule III, Part A, Para A, Clause (i) (ii) and (iii) of Sub- para 7B of SEBI (LODR) Regulations, 2015			with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9 th September, 2015	same with the Stock Exchanges.	same with the Stock Exchanges.
24.	The Listed Entity being falling under the criteria of Large Corporate Borrowers as specified in SEBI Circular No. SEBI/HO/DDHS/CIR /P/2018/144 dated 26 th November, 2018 has not made disclosure to Stock Exchanges.	31 st March, 2021	Disclosure as per Circular SEBI/HO/DDHS /CIR/P/2018/144	Violation of Circular SEBI/HO/DDHS/CIR/P /2018/144,	The Company is yet to submit the same to the exchanges	The Company is yet to submit the same to the exchanges
25.	There were instances of non-submission of certificate under Regulation 74(5) of SEBI (DP) Regulations, 2018 for quarter ended on 30 th June, 2020 and 30 th September, 2020.	31 st March, 2021	Regulation 74(5) of SEBI (DP) Regulations, 2018	Violation 74(5) of SEBI (DP) Regulations, 2018	The Company has not taken appropriate measures to make the non- compliances good.	The Company has not taken appropriate measures to make the non- compliances good.



26.	The Company has not submitted the details of resignation of Independent Director Mr. Satyanarayana Raju w.e.f. 18 th April, 2019 in line with Schedule III, Part A, Para A, Clause (i) (ii) and (iii) of SEBI (LODR), 2015 to the Stock Exchanges.	31 st March, 2020	Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9 th September, 2015:	Violation of Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9 th September, 2015	The Company is yet to submit the same with the Stock Exchanges.	The Company is yet to submit the same with the Stock Exchanges.
27.	The Listed Entity has not submitted the Compliance Certificate for the Half-year ended 31 st March, 2019 due to be filed during the reporting Period to the Stock Exchanges as required under Regulation 7(3) of SEBI (LODR), 2015.	31 st March, 2020	Regulation 7(3) of SEBI (LODR), 2015.	Violation of 7(3) of SEBI (LODR), 2015.	The Company is yet to submit the Certificate to the Stock Exchanges for the Half-year ended 31 st March, 2019.	The Company is yet to submit the Certificate to the Stock Exchanges for the Half-year ended 31 st March, 2019.
28.	There were instances of non-submission of details of Related Party	31 st March, 2020	Regulation 23(9) of SEBI (LODR), 2015	Violation of 23(9) of SEBI (LODR), 2015	The Company is yet to submit the	The Company is yet to submit the



	Transactions to Stock Exchanges for the Half-Year ended 31 st March, 2019 and 30 th September, 2019 as required under Regulation 23(9) of SEBI (LODR), 2015.				details to the Stock Exchanges for the Half-Year ended 31 st March, 2019 and 30 th September, 2019.	details to the Stock Exchanges for the Half-Year ended 31 st March, 2019 and 30 th September, 2019.
29.	There was an instance of non-disclosure of Brief Profile details in respect of disclosures made to Stock Exchanges regarding Appointment of Company Secretary on 17 th July, 2019 and on 13 th November, 2019, as required under Regulation 30 of SEBI (LODR), 2015.	31 st March, 2020	Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9 th September, 2015:	Violation of 30 of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated 9 th September, 2015:	The Company is yet to submit the details to the Stock Exchanges.	The Company is yet to submit the details to the Stock Exchanges.
30.	There was an instance of non-submission of Annual Secretarial Compliance Report for the year ended 31 st	31 st March, 2020	Regulation 24A of SEBI (LODR), 2015 read with SEBI Circular CIR/CFD/CMD1/27/	Violation of Regulation 24A of SEBI (LODR).	The Company is yet to submit the report to the Stock	The Company is yet to submit the report to the Stock



	March, 2019 under Regulation 24A of SEBI (LODR), 2015 to the Stock Exchanges.		2019 dated 08 th February, 2019.		Exchanges for the year ended 31 st March, 2019.	Exchanges for the year ended 31 st March, 2019.
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II. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

S.No	Particulars	Compliance Status (Yes/ No/ NA)	Observations Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	Nil
2.	<u>Adoption and timely updation of the Policies:</u> - 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	Nil
		No	The Company has not ensured compliance with Regulation 8(1) of the SEBI (PIT) Regulations, 2015, as the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information was not published on the Company's official website in the manner prescribed under the said Regulations.
3.	<u>Maintenance and disclosures on Website:</u> The Listed entity is maintaining a functional website	Yes	Nil



	- 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 No	Certain disclosures/information required to be disseminated under Reg 46(2) of SEBI (LODR) Regulations, 2015 were not available on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are not accurate and is not specific and does not redirect to the relevant document(s)/ section of the website.
4.	<u>Disqualification of Director:</u> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	As per the information provided by the Company, the Company does not have any Material Subsidiary as defined under the LODR Regulations. Further, the details of the subsidiaries have been disclosed in Form AOC-2 as an Annexure to the Board's Report.
6.	<u>Preservation of Documents:</u> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of	Yes	Nil 

	Preservation of Documents and Archival policy prescribed under SEBI (LODR) Regulations, 2015.		
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	<u>Related Party Transactions:</u> (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 NA	Nil
9.	<u>Disclosure of events or information:</u> 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	Nil
10.	<u>Prohibition of Insider Trading:</u>		



	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The Company does not have a system of structured digital database which as required under the Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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. (**)	NA	As per the information provided by the Company, no action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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	Nil
13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance	Yes	



	observed for any SEBI regulation/ circular/ guidance note etc.		
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We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR Regulations.

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 Company.
2. Our responsibility is to report 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 Company.
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 of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For R&A Associates,
Company Secretaries
Peer Reviewed Firm
PRN.: 6659/2025



[Handwritten Signature]

R. Ramakrishna Gupta
Senior Partner
FCS No: 5523
CP No: 6696

UDIN: F005523H000555347

Firm Registration No.: P1994AP011100

Place: Hyderabad
Date: 30th May, 2026