



Dated 30th May 2026

To The Secretary, Listing Department BSE Limited P.J Towers, Dalal Street Mumbai-400 001 Maharashtra, India Scrip Code: 532767	To The Manager, Listing Department National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C/1 G Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051 Maharashtra, India Scrip Code: GAYAPROJ
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Dear Sir/ Madam,

Sub: Submission of Annual Secretarial Compliance Report for the year ended 31st March 2026 – reg.

Ref: Regulation 24A of SEBI (Listing) Regulations.

Please find enclosed Annual Secretarial Compliance Report of the Company for the year ended 31st March 2026, under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2021, issued by M/s.N.Madhavi & Associates, Company Secretaries, Secretarial Auditors of the Company.

Request to take the same on your record.

Thanking You,
for **Gayatri Projects Limited**

Shashank Jain
Company Secretary & Compliance Officer

Encl: As above

Regd. & Corp. Office:

Gayatri Projects Limited, B1, 6-3-1090, TSR Towers T +91 40 2331 4284/4296
Raj Bhavan Road, Somajiguda, Hyderabad 500 082 T.S F +91 40 2339 8435
CIN: L99999TG1989PLC057289

E gplhyd@gayatri.co.in
www.gayatri.co.in



N.Madhavi & Associates

Company Secretaries

403, Home Sree Towers, Madhavi Nagar,

Kukatpally, Hyderabad – 500 072

Cell: 8008118496; Email: madhavi.acs@gmail.com

SECRETARIAL COMPLIANCE REPORT

OF

GAYATRI PROJECTS LIMITED

(CIN: L99999TG1989PLC057289)

FOR THE YEAR ENDED 31ST MARCH 2026

The Listed entity was admitted into Corporate Insolvency Resolution Process ('CIRP') by the Hon'ble National Company Law Tribunal ('NCLT'), Hyderabad, dated 15.11.2022 under the provisions of Insolvency & Bankruptcy Code, 2016 (IBC). The powers of the Board of Directors of the Company were suspended from the date of the order as per Section 17 of the Code and vested with Mr. Sai Ramesh Kanuparthi, Resolution Professional.

The application filed under section 12A of IBC has been approved by the Hon'ble NCLT on 10th September 2025 and the Company Petition IB/308/HDB/2022 filed u/s 7 was allowed to be withdrawn. Accordingly, the CIRP against the company was also withdrawn.

This report is to be read in the light of the fact that the company was under CIRP during the period under review partially.

The accuracy and completeness of the information contained in this certificate may be liable to correction or modification in the light of any new information that may come to light at a later date.

We have examined:

- (a) all the documents and records made available to us and explanation provided by GAYATRI PROJECTS LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document / filing, as may be relevant, which has been relied upon to make this certification

for the 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;



- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (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 to the Company during the review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the Company during the review period);**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) 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:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified in Annexure 'A'.
- (b) The actions taken by the listed entity to comply with the observations made in previous reports are specified in 'Annexure B'.

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	
2.	Adoption and timely updation of the Policies: - 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 Yes	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
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 - Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website	Yes Yes Yes	
4.	Disqualification of Director: 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	
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes Yes	
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
8.	Related Party Transactions: (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 Yes -	
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder	Yes	
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Partially complied	Details provided in Annexure 'A'
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 (**)	No	Detailed in 'Annexure A' & 'Annexure B'
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	There was no resignation by Statutory Auditors of the company during the period under review



Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
13.	Additional Non-compliances, if any: Additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	Details provided in Annexure 'A'

Other observation(s):

- The trading in shares of the company was suspended w.e.f. 15th December 2025 and the same was revoked by both the Exchanges vide notice/circular dated 1st April 2026 effective from 9th April 2026.

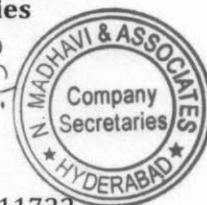
Assumptions & Limitation of scope and Review:

- Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- 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.

**for M/s. N. Madhavi & Associates
Company Secretaries**

(Signature)

N. Madhavi
Proprietor



M No. A16866, CP.No:11732

UDIN: A016866H000522976

Peer Review Cert. No: 5479/2024

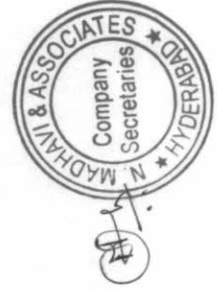
Place: Hyderabad

Date: 29.05.2026

Annexure – A

Action(s) taken against the listed entity by Stock Exchanges including under the Standard Operating Procedures issued vide SEBI Regulations / circulars

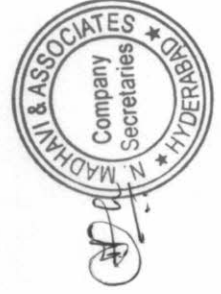
Sl. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action / Advisory / Clarification / Fine / Show Cause Notice / Warning, e.t.c.	Details of violation	Fine Amount (Rs.)	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Appointment of compliance officer	Regulation 6 of SEBI (LODR) Regulations, 2015 r.w. SEBI Circular No. SEBI/HO/CD/ CMD/CIR/P/2020 /12 dated 22.01.2020	Non-appointment/ Delayed appointment of Compliance Officer	NSE & BSE	Fine	Delay in filling of vacancy in the position of Company Secretary & Compliance Officer (CS & CO)	Following fine amount (excluding GST) by each of the Exchanges:	The vacancy in the position of Company Secretary & Compliance Officer (CS & CO) was filled by appointment of Mr. Shashank Jain w.e.f 23.10.2025	Post CIRP period, the vacancy in the position of Compliance Officer (CS & CO) was filled by appointment of Mr. Shashank Jain w.e.f 23.10.2025	The said fines were waived by NSE and partially waived by BSE vide orders dated 05.05.2026 & 12.05.2026 respectively
							Quarter ended			
							31.03.2025			
							30.06.2025			
							30.09.2025			
							31.12.2025			
							Fine (Rs.)			
							90,000			
							91,000			
							92,000			
							22,000			



Sl. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action / Advisory / Clarification / Fine / Show Cause Notice / Warning, e.t.c.	Details of violation	Fine Amount (Rs.)	Observations / Remarks of the practicing Company Secretary	Management Response	Remarks
2.	Submission of shareholding pattern	Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015 r.w. SEBI Circular No. SEBI/HO/CD/ CMD/CIR/P/2 020/12 dated 22.01.2020	Delayed submission of Shareholding pattern	NSE & BSE	Fine	Delayed submission of Shareholding pattern for the quarter ended 30.06.2025	Rs.2,000 (excluding GST) by both the Exchanges	The compliance was made but with delay	The delay of 1 day in submission of Shareholding Pattern was due to inadvertence and not deliberate	The said fine was waived by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively
3.	Submission of annual report	Regulation 34(1)(a) of SEBI (LODR) Regulations, 2015 r.w. SOP Circular No. SEBI/HO/CD/ CMD/CIR/P/2 020/12 dated 22.01.2020	Delayed submission of Annual Report	NSE & BSE	Fine	Delayed Compliance in submission of Annual Report for the financial year ended 31.03.2025	Rs.1,96,000 (excluding GST) by both the Exchanges	The Annual Report for the financial year ended 31.03.2025 was submitted to the Stock Exchanges on 5 th February 2026 with a considerable delay	The delay was caused during CIRP period. The company took immediate steps to ensure compliance with applicable laws and achieved the same	The said fine was waived by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively



Sl. No	Compliance Requirement (Regulations/guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action / Advisory / Clarification / Fine / Notice / Warning, e.t.c.	Details of violation	Fine Amount (Rs.)	Observations / Remarks of the practicing Company Secretary	Management Response	Remarks
4.	Submission of annual audited and Consolidated financial results	Regulation 33(3)(d) of SEBI (LODR) Regulations, 2015 r.w SEBI Circular No. SEBI/HO/CD/CMD/CIR/P/2 020/12 dated 22.01.2020	Delay in submission of annual audited financial results	NSE & BSE	Fine	Delay in submission of Annual audited Financial Results for the Quarter ended year 31.03.2025	Fine of Rs.10,65,000 (excluding GST) each by both the Exchanges	The audited financial results for the quarter and year ended 31.03.2025 were approved by the Board and submitted on 29.12.2025 with a considerable delay	The delay was caused during CIRP period. The company took immediate steps to ensure compliance with applicable laws and achieved the same	The said fine was waived by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively
5.	Submission of unaudited financial results	Regulation 33(3)(a) of SEBI (LODR) Regulations, 2015 r.w SEBI Circular No. SEBI/HO/CD/CMD/CIR/P/2 020/12 dated 22.01.2020	Delay in submission of unaudited financial results	NSE & BSE	Fine	Delay in submission of unaudited Financial Results for the Quarters ended:	Following fine amount (excluding GST) by both the Exchanges: Rs.6,95,000 Rs.2,35,000	The audited financial results for the quarter and year ended 31.03.2025 were approved by the Board and submitted on 31.12.2025 with a considerable delay	The delay was caused during CIRP period. The company took immediate steps to ensure compliance with applicable laws and achieved the same	The said fine was waived by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively



Sl. No	Compliance Requirement (Regulations/guidelines including specific clause)	Regulation / Circular No.	Deviations	Action taken by	Type of Action / Advisory / Clarification / Fine / Notice / Warning, e.t.c.	Details of violation	Fine Amount (Rs.)	Observations / Remarks of the practicing Company Secretary	Management Response	Remarks
6.	Maintenance of Structured Digital Database (SDD)	Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	Database not maintained for part of the year	NSE & BSE	The Company scrip was marked as SDD non-complaint	Database not maintained for part of the year	---	The SDD software was restored post-CIRP. Details of UPSI shared thereafter were entered therein in the prescribed manner.	Owing to initiation of CIRP proceedings against the company, the SDD which was already in place could not be maintained. Post-CIRP, necessary steps were taken to ensure due maintenance of the same and entry of UPSI shared within or outside the organisation	The company is SDD compliant now.



Annexure - B

Details of Observations / Remarks of the Practicing Company Secretary in the previous report(s) and the remedial action(s) thereon by the listed entity -

For the year ended 31st March 2023

Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The company had not appointed CFO from the date of resignation of Mr.P.Sreedhar Babu, CFO w.e.f 31.08.2022	Regulation 30 of SEBI (LODR) Regulations, 2015 r.w. SEBI Circular No. CIR/CFD/CMD/4/2015 dt. 09.09.2015	Vacancy in the office of CFO that arose w.e.f 14.01.2023 not filled	The Board of Directors, at their meeting held on 13.09.2025 appointed Mr.N.Seshagiri Rao as CFO with immediate effect	The delay was caused owing to CIRP. Further, the company made necessary applications for waiver of fines imposed and the same was approved by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively.
2	The company had not appointed Company Secretary-cum- Compliance Officer upon the resignation of previous Company Secretary Mr. Chetan Kumar Sharma w.e.f 14.01.2023	Regulation 6 of SEBI (LODR) Regulations, 2015	Vacancy in the office of Company Secretary & Compliance Officer that arose w.e.f 14.01.2023 not filled	The Board of Directors at their meeting held on 23.10.2025, appointed Mr.Shashank Jain as Company Secretary & Compliance Officer with immediate effect	-do-
3	Delay in submission of Unaudited Financial results (Standalone & Consolidated) for the quarter and period ended 31.12.2022	Regulation 33 of SEBI (LODR) Regulations, 2015	Fine was imposed by both the Exchanges	The results were submitted with a delay of 7 days.	-do-



Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ specific clause)	Details of violation/deviation and actions taken if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
4	The Company is maintaining Structured Digital Database (SDD) as required under Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015. The Company has complied with the said regulations upto quarter ended 31.12.2022. However, the same has not been complied for the quarter ended 31.03.2023 as the company is undergoing CIRP wef 15.11.2022 and there are no personnel to appraise about the software	Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	Non-maintenance of SDD software	Consequent upon withdrawal of CIRP proceedings against the company, the powers of management were vested back in the Board of Directors. Consequently, steps were taken for maintenance of database and making necessary entries therein of sharing of UPSI within and outside the organization	CIRP proceedings against the company were withdrawn. The Board's suspension was revoked and the powers were vested back to the Board. The necessary entries pertaining to sharing of UPSI thereafter, were recorded in the SDD software.



For the year ended 31st March 2024

Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken /penalty imposed if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Company is yet to pay the fine imposed and submit the annual report for the financial year ended 31.03.2023	Regulation 34 of SEBI (LODR) Regulations, 2015	Non-submission of Annual Report for the year ended 31.03.2023 and fine was imposed by both the Exchanges	Annual report for the year ended 31.03.2023 was duly submitted on 25.11.2025	The delay was caused owing to CIRP. Further, the company made necessary applications to the Stock Exchanges for waiver of fines imposed and the same was approved by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively.
2	Company is yet to pay the fine imposed and submit the Financial results for the quarters ended June, September and December 2023	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission of Unaudited financial results for quarters ended June, September and December 2023, and fine was imposed by both the Exchanges	Unaudited financial results for the quarters ended June, September and December 2023 as approved by the Board of Directors were submitted to the Stock Exchanges on 24.12.2025	-do-
3	Company is yet to pay the fine imposed and appoint the Company Secretary	Regulation 6 of SEBI (LODR) Regulations, 2015	Vacancy in the office of Company Secretary & Compliance Officer w.e.f 14.01.2023 not filled and fine was imposed by both the Exchanges	The Board of Directors at their meeting held on 23.10.2025, appointed Mr.Shashank Jain as Company Secretary & Compliance Officer with immediate effect	-do-

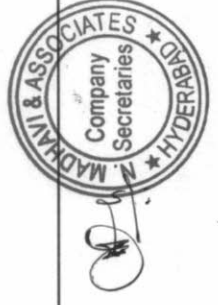


Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken /penalty imposed if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
4	Non submission of large corporate disclosure for the FY 2023-2024	Circular No. SEBI/HO/DDHS/P/ CIR/2021/613 dated April 13, 2022	Non submission of large corporate disclosure for the FY 2023-2024	'Large Corporate' disclosure was submitted to the Exchanges on 16.07.2025	The delay was caused owing to CIRP. The necessary submission was made with a delay
5	Delay in submission of periodic compliances	Compliances u/Reg. 13(3), 27(2), 31(1)(b) of SEBI Listing Regulations and Reconciliation of share capital audit report	Fine was imposed by both the exchanges for delay in submission(s)	Submitted the periodic compliances with delay	-do-
6	Non maintenance of SDD software	Maintenance of Structured Digital Data Base (SDD) as required under regulation 3(5) & 3(6) of SEBI (PIT) Prohibition of Insider trading Regulations, 2015	The Company scrip was marked as SDD non-complaint	Post CIRP, the Company took measures for maintenance of SDD software and now it is SDD complaint	-do-



For the year ended 31st March 2025

Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken /penalty imposed if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Company is yet to pay the fine imposed and submit the annual report as on date of this report	Regulation 34 of SEBI (LODR) Regulations, 2015	Non-submission of Annual Report for the FY 2023-2024	Annual report for the year ended 31.03.2024 was submitted on 5th February 2026. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	The delay was caused owing to CIRP. Further, the company made necessary applications to the Stock Exchanges for waiver of fines imposed and the same was approved by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively.
2	Company is yet to pay the fine imposed and submit the financial results	Regulation 33 of SEBI (LODR) Regulations, 2015	Non-submission of Financial Results for the quarter ended 31st December, 2024	Unaudited financial results for the quarter ended 31.12.2024 were submitted to the Exchanges on 29.12.2025. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	-do-
3	Company has not paid the fine imposed. However, the requisite filings are submitted	Regulation 31 & 13 of SEBI (LODR) Regulations, 2015	Non-submission of Shareholding Pattern and investor complaints for the quarter ended 31st March 2024	Shareholding Pattern and investor complaints for the quarter ended 31st March 2024 were submitted with a delay on 22.10.2024 and 11.06.2024 respectively. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	-do-
4	The Company is yet to appoint a Company Secretary and compliance officer	Regulation 6 of SEBI (LODR) Regulations, 2015	Non-appointment of Company Secretary and compliance officer	The Board of Directors at their meeting held on 23.10.2025, appointed Mr. Shashank Jain as Company Secretary & Compliance Officer with immediate effect. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	-do-



Sr. No.	Observations made in the secretarial compliance report	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken /penalty imposed if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
5	Non submission of financial results for all quarters for the FY 2024-25	Regulation 33 & 23 of SEBI (LODR) Regulations, 2015	Non submission of financial results for all quarters for the FY 2024-25	Unaudited financial results for the quarters ended June, September, December 2024 and Audited financial results for the quarter & year ended 31.03.2025 were submitted to the Exchanges on 29.12.2025. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	The delay was caused owing to CIRP. Further, the company made necessary applications to the Stock Exchanges for waiver of fines imposed and the same was approved by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively.
6	Non-submission of Annual secretarial compliance report for the FY 2023-2024	Regulation 24A of SEBI (LODR) Regulations, 2015	Non-submission of Annual secretarial compliance report for the FY 2023-2024	The Annual Secretarial Compliance report for the year ended 31.03.2024 was submitted on 08.07.2025 with a delay. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	-do-
7	Non submission of Corporate Governance and Integrated Governance report for the quarter ended September, December 2024 and March 2025	Regulation 27 of SEBI (LODR) Regulations, 2015	Non submission of Corporate Governance and Integrated Governance report for the quarter ended September, December 2024 and March 2025	Submissions were made with a delay. Necessary applications were made to the Stock Exchanges for waiver of fines imposed	-do-



Sr. No.	Observations made in the secretarial compliance report	Compliance Requirements/ (Regulations/ circulars/ guidelines including specific clause)	Details of violation/deviation and actions taken /penalty imposed if any, on the listed entity	Remedial actions if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
8	Non submission of large corporate disclosure for the FY 2024-2025	Circular No. SEBI/HO/DDHS/P/CIR/2021/613 dated April 13, 2022	Non submission of large corporate disclosure for the FY 2024-2025	'Large Corporate' disclosure was submitted to the Exchanges on 13.06.2025	The delay was caused owing to CIRP. Further, the company made necessary applications to the Stock Exchanges for waiver of fines imposed and the same was approved by the BSE & NSE vide their orders dated 12.05.2026 & 05.05.2026 respectively.
9	Company is yet to adopt systematic SDD software under PIT regulations to monitor the insider trading and UPSI	Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	Company is yet to adopt systematic SDD software under PIT regulations to monitor the insider trading and UPSI	SDD compliance has been achieved post-CIRP withdrawal. Necessary measures were taken for measures for maintenance of SDD software and updation of sharing of UPSI.	-do-

N. Madhavi & Associates
Company Secretaries



(Signature)

N. Madhavi
Proprietor

M.No. A16866, CP.No:11732

UDIN: A016866H000522976

Peer Review Cert. No: 5479/2024

Place: Hyderabad
Date: 29.05.2026