



Anuradha Malik  
**Practicing Company Secretary**

(Peer Reviewed)

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**Annual Secretarial Compliance Report**  
**(Issued pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019)**

**For Wisec Global Limited for the year ended 31<sup>st</sup> March, 2024**

I, Anuradha Malik have examined:

- (a) all the documents and records made available to us and explanation provided by Wisec Global 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 year ended 31<sup>st</sup> March, 2024 (“Review Period”) in respect of compliance with the provisions of:
  - (i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
  - (ii) 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; **Applicable**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Applicable**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable**
- (e) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and Securities and Exchange Board of India (Share based Employee Benefits) Regulations, 2014; **Not Applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Applicable**
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulation(s), 1996 and 2018 and circulars/ guidelines issued thereunder; **Applicable**

(*Note: The aforesaid list of Regulations is only illustrative. The list of all SEBI Regulations, as may be relevant and applicable to the listed entity for the review period, shall be added.*)

Based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines (which ever applicable to the Company) issued hereunder, except in respect of matters specified below:-

S.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	A listed entity shall appoint a qualified company secretary as the compliance officer.	As per Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Company has not appointed Company Secretary as the Compliance officer during Financial Year 2023-24	PCS	Advisory	Non Compliance with appointment of Company Secretary as the Compliance officer during Financial Year 2023-24	NA	During the period under review, it has been observed that Company failed to appoint Company Secretary as the Compliance officer during Financial Year 2023-24	The Company had no revenue, during the financial year 2023-24 and the Company suffered huge loss, thereby the Company was suffering from the shortage of funds, thus could not employ Company Secretary.	-
2	The listed entity shall file Statement of Investor Complaint with the recognised stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	As per Regulation 13(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has not filed Statement of Investor Complaint with the recognised stock exchange for the Quarter Ended September, 2023 on a quarterly basis, within twenty one days from the end of each quarter and delay filing for the Quarter Ended June, 2023	PCS	Advisory	The Company has not filed Statement of Investor Complaint with the recognised stock exchange for the Quarter Ended September, 2023 on a quarterly basis, within twenty one days from the end of each quarter and delay filing for the Quarter Ended June, 2023	NA	During the period under review, it has been observed that the Company has not filed Statement of Investor Complaint with the recognised stock exchange for the Quarter Ended September, 2023 on a quarterly basis, within twenty one days from the end of each quarter and delay filing for the Quarter Ended June, 2023	As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.	-

3	The listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), in the manner specified by the Board or the recognised stock exchange(s).	As per Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Pursuant to Reg. 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entity not paid all such fees or charges, as applicable, to the recognised stock exchange(s), during the period under review	PCS	Advisory	Pursuant to Reg. 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entity not paid all such fees or charges, as applicable, to the recognised stock exchange(s), during the period 2023-24	NA	Pursuant to Reg. 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entity shall pay all such fees or charges, as applicable, to the recognised stock exchange(s), during the period under review, it has been observed that Company have not paid its Annual Listing Fee to BSE Ltd.	As stated above the Company had no revenue, during the financial year 2023-24 and the Company suffered huge loss, thereby the Company was suffering from the shortage of funds, thus could not pay the listing fees.
4	The composition of board of directors of the listed entity shall be as follows: (a) board of directors shall have an optimum combination of executive and non-executive directors with at least one woman director and not less than fifty per cent. of the board of directors shall comprise of non-executive directors; (b) where the chairperson of the board of directors is a non-executive director, at least one-third of the board of directors shall comprise of independent directors and where the listed entity does not have a regular non-executive chairperson, at least half of the board of directors shall comprise of independent directors: Provided that where the regular non-executive chairperson is a promoter of the listed entity or is related to any promoter or person occupying management positions at the level of board of director or at one level below the board of directors, at least half of the board of directors of the listed entity shall consist of independent directors.	As per Regulation 17 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Pursuant to Reg. 17 of SEBI (LODR) the composition of the Board is not duly constituted, w.r.t. to optimum composition of Executive and non-Executive Director of the Company for the Financial year 2023-24	PCS	Advisory	Pursuant to Reg. 17 of SEBI (LODR) the composition of the Board is not duly constituted, w.r.t. to optimum composition of Executive and non-Executive Director of the Company for the Financial year 2023-24	NA	Pursuant to Reg. 17 of SEBI (LODR) it has been observed that the composition of the Board is not duly constituted, w.r.t. to optimum composition of Executive and non-Executive Director of the Company for the Financial year 2023-24	The Company had proper composition upto 18 <sup>th</sup> January 2024, however due to sudden demise of Mr. Satish Gola (being one of the Independent Director) the composition of the Board had been effected. The Company could not find any other appropriate candidate for the post of Independent Director.

5	The listed entity shall ensure that approval of shareholders for appointment or re-appointment]of a person on the Board of Directors [or as a manager] is taken at the next general meeting or within a time period of three months from the date of appointment, whichever is earlier:	As per Regulation 17 (1C) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Mr. Devendra Kumar Singh was appointed by Board as on as on 17 <sup>th</sup> June, 2023 subject to approval of Shareholders, but no approval taken from Shareholders taken with three months from the date of the appointment	PCS	Advisory	Mr. Devendra Kumar Singh was appointed by Board as on as on 17 <sup>th</sup> June, 2023 subject to approval of Shareholders, but no approval taken from Shareholders taken with three months from the date of the appointment during Financial Year 2023-24	NA	Mr. Devendra Kumar Singh was appointed by Board as on as on 17 <sup>th</sup> June, 2023 subject to approval of Shareholders, but no approval taken from Shareholders taken with three months from the date of the appointment	As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.
6	Every listed entity shall constitute a qualified and independent audit committee in accordance with the terms of reference, subject to the following: (a) The audit committee shall have minimum three directors as members. (b) At least two-thirds of the members of audit committee shall be independent directors and in case of a listed entity having outstanding SR equity shares, the audit committee shall only comprise of independent directors. (c) All members of audit committee shall be financially literate and at least one member shall have accounting or related financial management expertise.	As per Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Audit Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024. There were only two Directors in the Committee out of which only one Director is Independent Director.	PCS	Advisory	Audit Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024. There were only two Directors in the Committee out of which only one Director is Independent Director.	NA	Audit Committee is not properly constituted from 18 <sup>th</sup> January 2024 to 31 <sup>st</sup> March, 2024. There were only two Directors in the Committee out of which only one Director is Independent Director.	The Company had proper composition of the Board of Directors and Committees upto 18 <sup>th</sup> January 2024, however due to sudden demise of Mr. Satish Kumar Gola (being one of the Independent Director) the composition of the Board and Committees had been effected. The Company could not find any other appropriate candidate for the post of Independent Director.
7	The board of directors shall constitute the nomination and remuneration committee as follows: (a) the committee shall comprise of at least three directors ; (b) all directors of the committee shall be non-executive directors; and (c) at least two-third of the directors shall be independent directors	As per Regulation 19 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Nomination and Remuneration Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee out of which one Director is Executive Director.	PCS	Advisory	Nomination and Remuneration Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee out of which one Director is Executive Director.	NA	Nomination and Remuneration Committee is not properly constituted from 18 <sup>th</sup> January 2024 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee out of which one Director is Executive Director.	The Company had proper composition of the Board of Directors and Committees upto 18 <sup>th</sup> January 2024, however due to sudden demise of Mr. Satish Kumar Gola (being one of the Independent Director) the composition of the Board and Committees had been effected.

									The Company could not find any other appropriate candidate for the post of Independent Director.	
8	<p>(1) The listed entity shall constitute a Stakeholders Relationship Committee to specifically look into various aspects of interest of shareholders, debenture holders and other security holders.</p> <p>(2) The chairperson of this committee shall be a non-executive director.</p> <p>(2A) At least three directors, with at least one being an independent director, shall be members of the Committee and in case of a listed entity having outstanding SR equity shares, at least two thirds of the Stakeholders Relationship Committee shall comprise of independent directors</p>	As per Regulation 20 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Stakeholder Relationship Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee.	PCS	Advisory	Stakeholder Relationship Committee is not properly constituted from 13 <sup>th</sup> Dec, 2023 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee.	NA	Stakeholder Relationship Committee is not properly constituted from 18 <sup>th</sup> January 2024 to 31 <sup>st</sup> March, 2024 as there were only two Directors in the Committee.	The Company had proper composition of the Board of Directors and Committees upto 18 <sup>th</sup> January 2024, however due to sudden demise of Mr. Satish Kumar Gola (being one of the Independent Director) the composition of the Board and Committees had been effected. The Company could not find any other appropriate candidate for the post of Independent Director.	
9	<p>The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website:</p> <p>Provided that a 'high value debt listed entity' shall submit such disclosures along with its standalone financial results for the half year:</p> <p>Provided further that the listed entity shall make such disclosures every six months within fifteen days from the date of publication of its standalone and consolidated financial</p>	As per Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has failed to submit to the stock exchange disclosures of related party transactions for the Quarter ended March 2023 and September 2023	PCS	Advisory	The Company has failed to submit to the stock exchange disclosures of related party transactions for the Quarter ended March 2023 and September 2023	NA	The Company has failed to submit to the stock exchange disclosures of related party transactions for the Quarter ended March 2023 and September 2023	As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.	

	<p>results: Provided further that the listed entity shall make such disclosures every six months on the date of publication of its standalone and consolidated financial results with effect from April 1, 2023.</p>									
10	<p>The listed entity shall submit a quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s) within twenty one days from the end of each quarter.</p>	<p>As per Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements), 2015</p>	<p>The Company failed to submit to the stock exchange quarterly compliance report on corporate governance for the Quarter ended June 2023, September 2023 and March 2023</p>	PCS	Advisory	<p>The Company failed to submit to the stock exchange quarterly compliance report on corporate governance for the Quarter ended June 2023, September 2023 and March 2023</p>	NA	<p>It has been observed that Company failed to submit to the stock exchange quarterly compliance report on corporate governance for the Quarter ended June 2023, September 2023 and March 2023</p>	<p>As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.</p>	
11	<p>The listed entity shall give prior intimation to stock exchange about the meeting of the board of directors in which any of the following proposals is due to be considered: (a) financial results viz. quarterly, half yearly, or annual, as the case may be; (b) proposal for buyback of securities; (c) proposal for voluntary delisting by the listed entity from the stock exchange(s); (d) fund raising by way of further public offer, rights issue, American Depository Receipts/Global Depository Receipts/Foreign Currency Convertible Bonds, qualified institutions placement, debt issue, preferential issue or any other method and for determination of issue price: Provided that intimation shall also be given in case of any annual general meeting or extraordinary general meeting or postal ballot that is proposed to be</p>	<p>As per Regulation 20 of SEBI (Listing Obligations and Disclosure Requirements), 2015</p>	<p>The Company has not given the prior intimation to BSE for Board Meeting held on 30<sup>th</sup> May 2023 for discussion of Financial results for the March Quarter 2023</p>	PCS	Advisory	<p>The Company has not given the prior intimation to BSE for Board Meeting held on 30<sup>th</sup> May 2023 for discussion of Financial results for the March Quarter 2023</p>	NA	<p>The Company has not given the prior intimation to BSE for Board Meeting held on 30<sup>th</sup> May 2023 for discussion of Financial results for the March Quarter 2023</p>	<p>As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.</p>	

	held for obtaining shareholder approval for further fund raising indicating type of issuance.									
12	The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, in the format specified by the Board from time to time within the following timelines - (a) one day prior to listing of its securities on the stock exchange(s); (b) on a quarterly basis, within twenty one days from the end of each quarter; and, (c) within ten days of any capital restructuring of the listed entity resulting in a change exceeding two per cent of the total paid-up share capital	As per Regulation 31(1) of SEBI (Listing Obligations and Disclosure Requirements), 2015	The Company has not filed Shareholding Pattern for the Quarter Ended June 2023 and Sept 2023	PCS	Advisory	The Company has not filed Shareholding Pattern for the Quarter Ended June 2023 and Sept 2023	NA	The Company has not filed Shareholding Pattern for the Quarter Ended June 2023 and Sept 2023	As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.	
13	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	As per Regulation 31(1) of SEBI (Listing Obligations and Disclosure Requirements), 2015	Shareholding of Promoter and promoter group are not in dematerialized Form. Entire Shareholding of Promoter is in Physical Form during the Financial Year 2023-24	PCS	Advisory	Shareholding of Promoter and promoter group are not in dematerialized Form. Entire Shareholding of Promoter is in Physical Form during the Financial Year 2023-24	NA	Shareholding of Promoter and promoter group are not in dematerialized Form. Entire Shareholding of Promoter is in Physical Form during the Financial Year 2023-24	The Company has only one Promoter and he does not intend to keep his shareholding in the Dematerialized Form.	
14	The listed entity shall maintain a functional website containing the basic information about the listed entity	In terms of Regulation 46 of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015	The Listed entity is required to maintain a functional website containing the basic information about the Company. During the year 2023-24 under review it has been observed that the Company's website is not working	PCS	Advisory	The Listed entity is required to maintain a functional website containing the basic information about the Company. During the year 2023-24 under review it has been observed that the Company's website is not working	NA	The Listed entity is required to maintain a functional website containing the basic information about the Company. During the year 2023-24 under review it has been observed that the Company's website is not working	As stated above the Company had no revenue, during the financial year 2023-24 and the Company suffered huge loss, thereby the Company was suffering from the shortage of funds, thus could not pay to	

									maintain the functional website	
15	(1) The listed entity shall publish the following information in the newspaper: (a) *** (b) financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor: Provided that if the listed entity has submitted both standalone and consolidated financial results, the listed entity shall publish consolidated financial results along-with (1) Turnover, (2) Profit before tax and (3) Profit after tax, on a stand-alone basis, as a foot note; and a reference to the places, such as the website of listed entity and stock exchange(s), where the standalone results of the listed entity are available. (c) [***] (d) notices given to shareholders by advertisement.	In terms of Regulation 47(1) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015	(i) No publication of voting Results for Annual general Meeting (AGM) held on 30 <sup>th</sup> September, 2023 in Newspaper (ii) Financial Results for the Quarter ended Sept 2023 not published in Newspaper	PCS	Advisory	(i) No publication of voting Results for Annual general Meeting (AGM) held on 30 <sup>th</sup> September, 2023 in Newspaper (ii) Financial Results for the Quarter ended Sept 2023 not published in Newspaper		During the period under review it has been observed that the (i) Voting Results for Annual general Meeting (AGM) held on 30 <sup>th</sup> September, 2023 in has not been published in Newspaper (ii) Financial Results for the Quarter ended Sept 2023 not published in Newspaper	As stated above the Company had no revenue, during the financial year 2023-24 and the Company suffered huge loss, thereby the Company was suffering from the shortage of funds, thus could not get the results published in newspaper(how ever the same were uploaded on BSE portal)	
16	Certificate from RTA certifying all certificates have been demat within 30 days of receipt of security	Reg 74 of the SEBI (Depositories) Reg, 1996,	Company has not filed to Stock Exchange Certificate under Regulation 74 of the SEBI (Depositories) Reg 1996 for the quarter ended June 2023 and September 2023	PCS	Advisory	Company has not filed to Stock Exchange Certificate under Regulation 74 of the SEBI (Depositories) Reg 1996 for the quarter ended June 2023 and September 2023	NA	Non Compliance of filing of Certificate under Regulation 74 of the SEBI (Depositories) Regulation, 1996 to the Stock for the quarter ended June 2023 and September 2023	As stated above since the Company had no Company Secretary during the Financial Year 2022-23, certain compliances during the year had been missed out / filed belatedly.	
17	Listed entities shall additionally, on an annual basis, require a check by the PCS on compliance of all applicable SEBI Regulations and circulars/guidelines issued thereunder, consequent to which, the PCS shall submit a report to the listed	In terms of Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015	Company has not filed to Stock Exchange Report on Secretarial Compliance Report for the Financial year Ended 2022-23	PCS	Advisory	Company has not filed to Stock Exchange Secretarial Compliance Report for the Financial year Ended 2022-23		Company has not filed to Stock Exchange Secretarial Compliance Report for the Financial year Ended 2022-23	The Company had got the Secretarial Audit for the Financial Year 2022-23 done, however, audit report for same has been missed out to be filed	



	entity in the manner specified in this circular.										with BSE.	
18	Reg. 55A of SEBI (Depository and participants) Regulations, 1996, Reconciliation of Share Capital Audit	Reg. 55A of SEBI (Depository and participants) Regulations, 1996,	Pursuant to Reg. 55A of SEBI (Depository and participants) Regulations, 1996, Company failed to file Reconciliation of Share Capital and Audit Report, during the period under review	PCS	Advisory	Pursuant to Reg. 55A of SEBI (Depository and participants) Regulations, 1996, Company failed to file Reconciliation of Share Capital and Audit Report, during the period under review	NA	Pursuant to Reg. 55A of SEBI (Depository and participants) Regulations, 1996, Company failed to file Reconciliation of Share Capital and Audit Report, during the period under review				
19	Structured Digital Database file to Stock Exchange on Quarter basis within 21 days from end of Quarter	Regulation 3(5) & 3(6) of SEBI (PIT) Regulations 2015	Company has not Filed Structured Digital Database to the Stock Exchange for the Quarter Ended June 2023, September 2023 and December 2023	PCS	Advisory	Company has not Filed Structured Digital Database to the Stock Exchange for the Quarter Ended June 2023, September 2023 and December 2023	NA	During the year under review it has been observed that the Company has not Filed Structured Digital Database to the Stock Exchange for the Quarter Ended June 2023, September 2023 and December 2023	Since the Company did not had Company Secretary, thus the Certificate of Compliance for Structured Digital Database could not be filed.			

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

S.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/Observations made in the secretarial compliance report for the year ended.(the years are to be mentioned)	Comments of the practicing company secretary on the actions taken by the listed entity.	Remedial actions, if any, taken by the listed entity	Management Response	Remarks
Not Applicable												

S.no.	Particulars	Compliance Status (Yes/No)	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	Not Any

2	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Not Any
3	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>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</li> </ul>	No	There is no functional website maintained by the Company
		No	The website is not timely updated
		No	There is no functional website maintained by the Company
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	Not Any
5	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	There is no subsidiary of the Company
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 Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Not Any
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 as prescribed in SEBI Regulations	Yes	Not Any.
8	<u>Related Party Transactions:</u> (a) The Listed entity has obtained prior approval of Audit Committee for all Related Party Transactions (b) In case no prior approval obtained , the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee	No	During the period under review Company has not filed Related Party Transaction under Regulation 23(9) of SEBI (LODR) Regulations, 2015. However, as explained by the management there were no transactions with the related party.
9	<u>Disclosure of events or information:</u>		

	The Listed entity has provided all the required disclosure(s) under Regulation 30 with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Not Any
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	For the period under review Company the Company maintained Structured Digital Database (SDD) in excel sheet, which had been password protected however, no software for the same had been deployed by the Company.
11	<u>Actions taken by SEBI or Stock Exchange(s) , if any:</u> No Actions taken against the listed entity / its promoters / Directors/subsidiaries either by SEBI or Stock Exchanges (including under the Standard operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder.	Yes	As stated above the Company got suspended from Stock Exchange due to penal reasons
12	<u>Additional Non-compliances, if any:</u> No any additional Non-compliance observed for all SEBI Regulations/Circular/ guidance note, etc.	Not Applicable	

**Anuradha Malik**  
**Practicing Company Secretary**

**Mem. No.: 60626**  
**COP: 27205**

**Dated: 30<sup>th</sup> May, 2024**  
**Place: Sonipat**

**UDIN: A060626F000501220**