



# Padmalaya Telefilms Limited

CIN No.L92 111AP1991PLC013222  
Th

**Date: 12<sup>th</sup> August 2023**

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

Dear Sir,

**Sub:** Submission of Annual Secretarial Compliance Report for the **Financial Year 2022-23**  
**Ref:** Reg: 24A of SEBI (LODR) Regulations 2015, read with -  
SEBI Circular No: CIR/CFD/CMD1/27/2019 dated February 08, 2019

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

With reference to the captioned subject, and above referred Regulation 24A of SEBI (LODR) Regulations 2015, read with - SEBI Circular No: CIR/CFD/CMD1/27/2019 dated February 08, 2019, we hereby submit Annual Secretarial Compliance Report for the **Financial Year 2022-23** of **M/s. PADMALAYA TELEFILMS LIMITED**

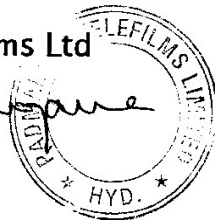
This is for your information and record.

Thanking you,

For Padmalaya Telefilms Ltd

*R. N. S. Sujan*

Compliance officer





**SECRETARIAL COMPLIANCE REPORT OF PADMALAYA TELEFILMS LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2023**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Padmalaya Telefilms Limited** (hereinafter referred as 'the listed entity') having its Registered Office at H.No.8-3-222/1/23, Madhuranagar, Yusufguda, Hyderabad, Telangana- 500038, India, reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents, and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, Puttaparthy Jagannatham & Co., a firm of Practicing Company Secretaries, Hyderabad, have examined:

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

**for the financial year ended 31<sup>st</sup> March 2023** ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:



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

I/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
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<b>1</b>	<b>Secretarial Standard</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013, and mandatorily applicable.	<b>No</b>	<b>Board Meeting Minutes and other documents were not presented to comment on the same.</b>
<b>2</b>	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>• All applicable policies under SEBI Regulations are adopted with the approval of the board of directors of the listed entities.</li><li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/ circulars/ guidelines issued by SEBI.</li></ul>	<b>No</b>	<b>None</b>
<b>3</b>	<b>Maintenance and disclosures on the Website:</b> <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>	<b>No</b>	<b>Website not updated with relevant disclosures and policies as required under the SEBI LODR.</b>
<b>4</b>	<b>Disqualification of Director:</b> None of the Directors of the Company are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity.	<b>Yes</b>	<b>None</b>
<b>5</b>	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies. (b) Disclosure Requirements of material as well as other subsidiaries.	<b>NA</b>	<b>No subsidiaries exist as on date.</b>
<b>6</b>	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per the Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	<b>No</b>	<b>But the same was not produced to us in this year.</b>



<b>7</b>	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluations of the Board, Independent Directors, and the Committees at the start of every financial year as prescribed in SEBI Regulations.	<b>Yes</b>	<b>None</b>
<b>8</b>	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of the 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.	<b>Yes</b>	<b>None</b>
<b>9</b>	<b>Disclosure of events or information:</b> 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.	<b>No</b>	<b>Detailed below*</b>
<b>10</b>	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	<b>Yes</b>	<b>None</b>
<b>11</b>	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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 (**).	<b>Yes</b>	<b>Yes, BSE has issued mails for violating regulations as prescribed and detailed below.*</b>
<b>12</b>	No additional non-compliance was observed for any SEBI regulation/circulars/guidance note etc.	<b>No</b>	<b>Yes, BSE has issued mails for violating regulations as prescribed and detailed below.*</b>



**Compliances related to the resignation of Statutory Auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October 2019: NA**

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	<b>i.</b> If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No Such event during the review period.
	<b>ii.</b> If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or	NA	No Such event during the review period.
	<b>iii.</b> If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No Such event during the review period.
2.	<b>Other conditions relating to the resignation of the statutory auditor</b>		





<p><b>i.</b> Reporting of concerns by the Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p><b>a.</b> In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p>	NA	No Such event during the review period.
<p><b>b.</b> In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information/explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable.</p> <p><b>c.</b> The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p>	NA	No Such event during the review period.
<p><b>ii.</b> Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in cases where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	NA	No Such event during the review period.



3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October 2019.	NA	No Such event during the review period.
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*\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

**(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	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc.	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks





	claus e)									
1	Reg 33	Regula tion 33, SEBI (LODR ) 2015	The Company has not Submitted the Financial results for the quarter ended 31 <sup>st</sup> December 2022. Also a mail has been received in 15.02.2023.	BSE	Fine	Delay in filing the financial results for the quarter ended 31 <sup>st</sup> December 2022.	1,121 00	The Company has made a late submission for the quarter ended 31 <sup>st</sup> December 2022	The Company has filed the financial results for the quarter ended 31 <sup>st</sup> December 2022 and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
2	Reg 29(2) /29(3 )	Regula tion 29(2)/ 29(3), SEBI (LODR ) 2015	The Company has received a mail dated 31.03.2023 from BSE Ltd for pay fine Rs. 11800/- for the Non – compliance.	BSE	Fine	Delay in furnishing prior intimation about the meeting of the board of directors for Quarterly results.	11800	It is observed that the company has not submitted the intimation of the Board Meeting to the Stock exchange and fine was imposed by the BSE.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
3	42 & 62	Regula tion 42 & 62, SEBI (LODR ) 2015	The Company has received a mail dated 11.03.2023 from BSE Ltd for non-compliance	BSE	-	Non-submission of information required under Regulation 46 and 62 of SEBI (LODR) Regulations 2015 on BSE Listing Centre	-	It was observed that the website of the company was not up to date and the company has not submitted the requirement under Regulation 42 till the date of report.	The Company is in the process of updating the website.	The website is still not updated.



4	13(3)	Regulation 13(3) SEBI (LODR) 2015	<p>The Company has received a mail dated 01.02.2023 from BSE Ltd for pay fine Rs. 25,960/-for the non-compliance for the Quarter ended December 31, 2022</p> <p>The Company has received a mail dated 16.08.2022 from BSE Ltd for pay fine Rs. 25,960/-for the non-compliance for the Quarter ended June 30, 2022.</p>	BSE	Fine	Till the fourth quarter Investor Complaint under Regulation 13(3) of SEBI (LODR) Regulations 2015 in XBRL Mode for the Quarter ended December 31, 2022 was not submitted with the BSE.	25,960	<p>It was observed that the company has not submitted the requirements to the BSE and fine was imposed by the stock exchange</p> <p>Ateh filings were made in August 2023 and there has been a significant delay in submitting the documents. Delay for more than 9 Months.</p>	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
5	3(5)	Regulation 3(5) of SEBI	The Company has received a mail dated 29.08.2022 & 21.10.2022	BSE	Notice	Till the fourth quarter of SDD Compliance Certificate for the	-	It was observed that the company has not compliant with said regulation till date of	The Company is in the process of procuring the	Non-Compliance still going.



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



		) Regulations 2015	compliance.			consolidated basis to the BSE.				
9	34	Regulation 34 of SEBI (LODR ) Regulations 2015	The Company has received a mail dated 21.10.2022 from BSE Ltd for pay fine of Rs. 30,680/- for non-compliance.	BSE	Fine	Non-submission of the Annual Report within the period prescribed under this regulation	30,680	It was observed that the company has not submitted the Annual Report in XBRL mode.	There has been a late submission of the said compliance.	Fine is still not paid by the Company.
10	Reg 40(9) & (10)	Regulation 40(9) & 40(10) of SEBI (LODR ) Regulations 2015	The Company has received a mail dated 07.06.2022 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter Certificate under Reg.40(9), (10) of SEBI (LODR) Regulations 2015 for the Year ended March 31, 2022, was not submitted by the Company on BSE.	-	It was observed that the company has not submitted the Regulation 40(9) & (10) till the fourth quarter and was only submitted on 7 <sup>th</sup> August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
11	27(2)	Regulation 27(2)	The Company has received a mail dated 23.01.2023	BSE	Fine	Till the fourth quarter, the company has Not	68440	It was observed that the company had not filed the CG report	The Company delayed the intimation and is in	Fine is still not paid by



		of SEBI (LODR) Regulations 2015	from BSE Ltd for non-compliance.			submitted the Corporate Governance for the Quarter ended December 31, 2022.		and non-compliance was continued till 31.03.2023. It was only submitted in August 2023.	the process of paying the fees shortly.	the Company.
12	27(2)	Regulation 27(2) of SEBI (LODR) Regulations 2015	The Company has received a mail dated 03.08.2022 & 03.02.2023 from BSE Ltd for non-compliance.	BSE	Notice	Till the fourth quarter company Not submitted the Corporate Governance for the Quarter ended June 30, 2022	-	It was observed that the company has not submitted till the fourth quarter and was only submitted in August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---
13	76	Regulation 76 of SEBI (Depositories & Participants) Regulations	The Company has received a mail dated 05.05.2022 from BSE Ltd for non-compliance.	BSE	Notice	Non-Submission of Reconciliation of Share Capital Audit Report for the quarter ended March 31, 2022	-	It was observed that the company has not submitted the SAR till the fourth quarter and was only submitted in August 2023.	The Company filed the same in the month of August 2023 and there has been a significant delay in filing the said compliance.	---



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





		of SEBI (LODR ) Regula tions 2015	from BSE Ltd for pay fine of Rs. 51,920/-for the non-compliance.			Pattern for the Quarter ended Dec 31, 2022, was not submitted.		end quarter and was filed in August 2023.	the process of paying the fees shortly.	the Company.
17	31(1)	Regula tion 31(1) of SEBI (LODR ) Regula tions 2015	The Company has received a mail dated 02.08.2022 from BSE Ltd for non-compliance.	BSE	-	Non-Submission of Shareholding Pattern for the Quarter ended June 30, 2022, within due date	-	The shareholding pattern was not filed within 30 days of the end quarter .	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.
18	31(1)	Regula tion 31(1) of SEBI (LODR ) Regula tions 2015	The Company has received a mail dated 05.05.2022 from BSE Ltd for non-compliance.	BSE	-	Non-Submission of Shareholding Pattern for the Quarter ended March 31, 2022, within the due date	-	The shareholding pattern was not filed within 30 days of the end quarter.	The Company delayed the intimation and is in the process of paying the fees shortly.	Fine is still not paid by the Company.



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



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

Sr. No	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Reg 6	Regulation 6 SEBI (LODR) 2015	The Company has not appointed Company Secretary for the first six	BSE	Fine	There was non-compliance regarding the appointment of Company Secretary and	Not Prescribed in the Notice from BSE	It is observed that the Company has not appointed a Company Secretary till 15.09.2021. However, a	The Company has tried to appoint a Company Secretary but could not find for till 02.09.2021.	NA



			months of the FY 2021-22.			Compliance Officer		Company Secretary and Compliance Officer was appointed and the same was intimated to BSE on 02.09.2021 w.e.f 15.09.2021.	However, a Company Secretary and Compliance Officer was appointed and the same was intimated to BSE on 02.09.2021 w.e.f 15.09.2021.	
2	Reg 13(3)	Regulation 13(3), SEBI (LODR) 2015	The Company has delayed in submitted the Statement of Investor Complaints/Grievances for the quarter ended 31 <sup>st</sup> December 2021.	BSE	-	There was a delay in submission of Statement of Investor Complaints /Grievances for the quarter ended 31 <sup>st</sup> December 2021	-	It was observed that the Company has filed the Statement of Investor Complaints/Grievances for the quarter ended 31 <sup>st</sup> December 2021 with a delay.	The Company has filed after the due date with a delay of 4 days.	NA
3	Reg 31	Regulation 31 SEBI (LODR) 2015	The Company has delayed in filing the Shareholding Pattern for the quarter ended 30 <sup>th</sup> June, 2021, 31 <sup>st</sup> December	BSE	-	The Company has delayed in filing the Shareholding Pattern for the quarter ended 30 <sup>th</sup> June, 2021, 31 <sup>st</sup> December	-	It was observed that the company has filed the shareholding pattern for June Quarter on 17.08.2021, for December quarter on 31.01.2022 and	The Company has filed after the due date with a delay of 57 days, 9 days and 131 days respectively.	NA



			2021 and 31 <sup>st</sup> March 2022.			2021 and 31 <sup>st</sup> March 2022.		for March quarter on 31.08.2022.		
4	Reg 7(3)	Regulation 7(3) of SEBI (LODR) Regulations 2015.	The Company has delayed in submitting the Regulation 7(3) for the year ended 31 <sup>st</sup> March 2022.	BSE	-	The Company has delayed in submitting the Regulation 7(3) for the year ended 31 <sup>st</sup> March 2022.	-	It was observed that the company has filed the Certificate under Regulation 7(3) after the due date on 29.08.2022.	The Company has filed after the due date with a delay of 121 days.	NA
5	Reg 40(9) & (10)	Regulation 40(9) & (10) of SEBI (PIT) Regulations 2015.	The Company has received a mail dated 07.06.2022 from BSE Ltd for the said non-compliance.	BSE	-	The Company has not submitted Certificate under Reg 40(9) & (10) for the year ended 31 <sup>st</sup> March 2022.	-	It was observed that the company has not complied with the said regulation till 29.08.2022.	The Company has filed after the due date with a delay of 121 days.	NA
6	Reg 23(9)	Regulation 23(9) of SEBI (PIT) Regulations 2015.	The Company has received a mail dated 14.07.2022 & 01.08.2022 from BSE Ltd for the said non-compliance.	BSE	Fine	Not submitted the report within fifteen days from the date of publication of its standalone financial results for the March 2022 quarter	150000+ 283200= 433200	It was observed that the company has not complied with said regulation till the date of issue of this Report.	As per the management, the company is in the process of filing the same at the earliest.	Neither the Fines levied were also paid by the Company.



7	Reg 24(A)	Regulation 24(A) of SEBI (LODR) Regulations 2015	The Company has not filed the Annual Secretarial Compliance Report for the year ended 31 <sup>st</sup> March 2021 within sixty days from end of each financial year.	BSE	-	Non- submission of Annual Secretarial Compliance Report for the year ended 31 <sup>st</sup> March 2021	-	It was observed that company has not complied with said regulation till 31.08.2021.	As reported by the management, The company has submitted the Certificate under Reg 24A during the year on 31.08.2021 with a delay of 93 days.	
8	Reg 46	Regulation 46 of SEBI (LODR) Regulations 2015	The Company has not complied with the said regulation.	BSE	-	The website of the company does not have requisite disclosures.	-	It was observed that company has not complied with said regulation till date of issue of this Report.	As reported by the management, the company is in the process of complying by updating all the necessary information as per the said regulation.	
9	Reg 74(5)	Regulation 74(5) of ( Depository & Participant )	The Company has delayed in filing the Reg 74(5) for the quarter 30 <sup>th</sup> June 2021, 31 <sup>st</sup>	BSE	-	There was a delay in filing for all the quarters.	-	It was observed that the company has submitted the Regulation 74(5) for 30 <sup>th</sup> June 2021, 31 <sup>st</sup> September 2021,	The Company has filed after the due dates.	NA





		Regulations 2018	September 2021, 31 <sup>st</sup> December 2021 and 31 <sup>st</sup> March 2022 within the due date.					31 <sup>st</sup> December and 31 <sup>st</sup> March 2022 i.e., after due date.		
10	Reg 76 & Reg 55A - XBRL	Regulation 76 of (Depository & Participant ) Regulations 2018  SEBI-DP Reg 55A-XBRL	The Company has not complied with Regulation 76 & 55A for the June 2021 and March 2022 quarters.	BSE	-	Delay in submission of Reconciliation of Share Capital Audit Report for the quarter ended 30th June, 2021, and 31st March 2022	-	It was observed that the company has filed Reg 76 after due date for the quarter 30 <sup>th</sup> June 2021 and 31 <sup>st</sup> March 2022 on 16.08.2021 and 29.08.2022 respectively.	The Company has filed after the due dates.	NA



*\* Note: Company Secretary and Compliance officer of the Company Ms. Sravanthi Badami (Membership No- A37580) has tendered her resignation from the post w.e.f 15th October 2022 and the company appointed f Sri. MVRS Suryanarayana (Currently holding the position as CFO & Authorised Signatory in the Company) as Compliance Officer.*

**Place: Hyderabad**

**Date: 12<sup>th</sup> August 2023**

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

**PUTTAPARTHI  
I NAVAJYOTH**

Digitally signed by  
PUTTAPARTHI  
NAVAJYOTH  
Date: 2023.08.12  
18:18:22 +05'30'

**CS Navajyoth Puttaparathi**

**Partner**

**FCS No: 9896; C P No: 16041**

**Peer Review Certificate No. 1158/2021**

**UDIN: F009896E000796198**

*Note: The management of the Company has approached us for the Reg 24 Certificate for the year ended 31.03.2023 on 02.08.2023. As per the information of the RTA and management made available to us, we are hereby issuing the Reg 24 Certificate for the year ended 31.03.2023.*