

South West Pinnacle Exploration Ltd (Formerly known as South West Pinnacle Exploration Pvt Ltd) CIN NO.: L13203HR2006PLC049480 <u>Regd & Corp Office</u>: Ground Floor, Plot No.15, Sector-44, Gurgaon 122003, Haryana, India. T: +91 124 4235400, 4235401 F: +91 124 4235402 E: info@southwestpinnacle.com W: www.southwestpinnacle.com

Date: 29.01.2024

To, Listing Department Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers, Dalal Street Mumbai-400001 Script Code: 543986

# Sub: Clarification on applicability of requirement for submission of Quarterly SDD Certificate by the company and submission of Annual Secretarial Compliance Report (ASCR)

Dear Sir/Madam,

In reference to your mail dated January 24, 2024 and further to your communication dated January 25, 2024 regarding non submission of SDD Compliance Certificate by the company for the quarter ended December 31, 2023.

We once again wish to inform you that our company has been listed on BSE w.e.f October 05, 2023 and requirement for submission of Annual Secretarial Compliance report for the period ended March 31, 2023 is not applicable on us that time and as per as per BSE Circular vide 20230329-21 issued dated March 29, 2023 the listed entities to whom the provisions of Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 are not applicable are required to continue to submit SDD Compliance certificate on quarterly basis, within 21 days from end of each quarter.

However, in continuation to our letter dated January 24, 2023 and in reference to your communication dated January 25, 2024 and ASCR obtained from a Practicing Company Secretarial Firm named as M/s KKS & Associates dated May 18, 2023 is attached as Annexure-I.

Hope this clarify the matter.

Thanking You

For South West Pinnacle Exploration Limited

VAISHAL

Vaishali Company Secretary & Compliance Officer



Mob.: 91-9811687001 E-mail ID : kksinghcs@gmail.com kksandassociates@gmail.com

## ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/S SOUTH WEST PINNACLE EXPLORATION LIMITED (CIN: L13203HR2006PLC049480) FOR THE YEAR ENDED 31st MARCH, 2023

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and NSE Circular NSE/CML/2023/21 dated March 16, 2023 and Circular Ref No: NSE/CML/ 2023/30 dated April 10, 2023/

We, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s South West Pinnacle Exploration 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,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 since there were no events requiring compliance during the Review Period);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018(Not Applicable since there were no events requiring compliance during the Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable since there were no events requiring compliance during the Review Period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(Not Applicable since there were no events requiring compliance during the Review Period);



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- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013(*Not Applicable since there were no events requiring compliance during the Review Period*);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018;

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

| Sr. No | Particulars  | Compliance<br>Status<br>(Yes/No/NA) | Observations/Re<br>marks by PCS |
|--------|--|-------------------------------------|---------------------------------|
| 1      | Secretarial Standards:   |                                     |                                 |
|        | The compliances of the listed entity are in<br>accordance with the applicable Secretarial<br>Standards (SS) issued by the Institute of<br>Company Secretaries India (ICSI)   | Yes                                 |                                 |
| 2      | <ul> <li>Adoption and timely updation of the</li> <li>Policies: <ul> <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 have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul> </li> </ul> | Yes<br>Yes                          |                                 |
| 3      | <ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity is maintaining a</li> </ul>  | Vac                                 |                                 |
|        | • The Listed entity is maintaining a functional website  | Yes                                 |                                 |
|        | <ul> <li>Timely dissemination of the<br/>documents/ information under a<br/>separate section on the website</li> </ul>   |                                     |                                 |
|        | <ul> <li>Web-links provided in annua</li> </ul>  |                                     |                                 |

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|   | corporate governance report under<br>Regulation 27(2) are accurate and<br>specific which re- directs to the<br>relevant document(s)/section of<br>the website  | Yes       |  |
|---|--|-----------|--|
| 4 | Disqualification of Director:<br>None of the Director(s) of the Company<br>is/are disqualified under Section 164 of<br>Companies Act, 2013 as confirmed by the<br>listed entity.   | Yes       |  |
| 5 | Details related to Subsidiaries of listed<br>entities have been examined w. r. t :<br>(a) Identification of material subsidiary<br>companies<br>(b) Disclosure requirement of material as<br>well as other subsidiaries  | No<br>N/A | Listed entity does<br>not have any<br>material<br>subsidiary,<br>however it has<br>one (1) wholly<br>owned subsidiary<br>M/s Pilot<br>Pipelines private<br>Limited and one<br>(1) subsidiary M/s<br>South west oil<br>field services<br>Private Limited. |
| 6 | Preservation of Documents:<br>The listed entity is preserving and<br>maintaining records as prescribed under<br>SEBI Regulations and disposal of records as<br>per Policy of Preservation of Documents<br>and Archival policy prescribed under SEBI<br>(LODR) Regulations, 2015. | Yes       |  |
| 7 | Performance Evaluation:<br>The listed entity has conducted<br>performance evaluation of the Board,<br>Independent Directors and the Committees<br>at the start of every financial year/during  | Yes       |  |

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|    | the financial year as prescribed in SEBI<br>Regulations.  |     |   |
|----|---|-----|---|
| 8  | Related Party Transactions:<br>(a) The listed entity has obtained prior<br>approval of Audit Committee for all related<br>party transactions; or<br>(b) The listed entity has provided detailed<br>reasons along with confirmation whether<br>the transactions were subsequently<br>approved/ratified/rejected by the Audit<br>Committee, in case no prior approval has   | Yes | Prior approval was<br>taken for all<br>Related Party<br>Transaction   |
| 9  | been obtained.<br>Disclosure of events or information:<br>The listed entity has provided all the<br>required disclosure (s) under Regulation 30<br>along with Schedule III of SEBI LODR<br>Regulations, 2015 within the time limits<br>prescribed thereunder.   | Yes |   |
| 10 | <b>Prohibition of Insider Trading:</b><br>The listed entity is in compliance with<br>Regulation 3(5) &3(6) SEBI (Prohibition of<br>Insider Trading) Regulations, 2015.  | Yes |   |
| 11 | Actions taken by SEBI or Stock<br>Exchange(s), if any:<br>No action(s) has been taken against the<br>listed entity/its promoters/ directors/<br>subsidiaries either by SEBI or by Stock<br>Exchanges (including under the Standard<br>Operating Procedures issued by SEBI<br>through various circulars) under SEBI<br>Regulations and circulars/guidelines issued<br>thereunder except as provided under<br>separate paragraph herein (**). | Yes | As informed by<br>the management,<br>no actions were<br>taken against the<br>company/ its<br>promoters/<br>directors/<br>subsidiaries either<br>by SEBI or by BSE<br>under SEBI<br>regulations and<br>circulars/<br>Guidelines issued |



|    |  |     | there under during<br>the year under<br>review.   |
|----|--|-----|---|
| 12 | Additional Non-compliances, if any:<br>No additional non-compliance observed for<br>any SEBI regulation/circular/guidance note<br>etc. | Yes | No additional non-<br>compliances were<br>observed for any<br>SEBI regulation/<br>Circular/ Guidance<br>note etc. during<br>the year under<br>review. |

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

| Sr. No. | Particulars  | Compliance Status<br>(YES/NO/NA) | Observations<br>/Remarks by<br>PCS  |  |
|---------|--|----------------------------------|---|--|
| 1       | Compliances with the following cond<br>at  | itions while appointing/nuditor  | e-appointing an   |  |
|         | i.If the auditor has resigned within 45<br>days from the end of a quarter of a<br>financial year, the auditor before such<br>resignation, has issued the limited<br>review/ audit report for such quarter;<br>or   | NA                               |   |  |
|         | ii. 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                               | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year |  |
|         | iii. If the auditor has signed the limited<br>review/ audit report for the first three<br>quarters of a financial year, the<br>auditor before such resignation, has<br>issued the limited review/ audit report<br>for the last quarter of such financial<br>year as well as the audit report for<br>such financial year. | NA                               | under review.   |  |
|         | year as well as the audit report for   |                                  |   |  |



| 2 | Other conditions relating to resignation of statutory auditor  |    |  |  |  |  |  |  |
|---|--|----|--|--|--|--|--|--|
|   | i. Reporting of concerns by Auditor<br>with respect to the listed entity/its<br>material subsidiary to the Audit<br>Committee:   | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |
|   | a. In case of any concern with<br>the management of the listed<br>entity /material subsidiary<br>such as non-applicability of<br>information /non- cooperation<br>by the management which has<br>hampered the audit process,<br>the auditor has approached<br>the Chairman of the Audit<br>Committee of the listed entity<br>and the Audit committee shall<br>receive such concern directly<br>and immediately without<br>specifically waiting for the<br>quarterly Audit Committee<br>meetings.     | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |
|   | b. In case the auditor proposes<br>to resign all concerns with<br>respect to the proposed<br>resignation, along with<br>relevant documents has been<br>brought to the notice of the<br>Audit Committee. In cases<br>where the proposed<br>resignation is due to non-<br>receipt of information /<br>explanation from the<br>company, the auditor has<br>informed the Audit Committee<br>the details of<br>information/explanation<br>sought and not provided by<br>the management, as<br>applicable. | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |

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|   | c. The Audit Committee / Board<br>of Directors, as the case may<br>be, deliberated on the matter<br>on receipt of such information<br>from the auditor relating to<br>the proposal to resign as<br>mentioned above and<br>communicate its views to the<br>management and the auditor.  | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |
|---|--|----|--|--|
|   | <ul> <li>ii. Disclaimer in case of non-receipt of information:</li> <li>The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</li> </ul> | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |
| 3 | The listed entity / its material<br>subsidiary has obtained information<br>from the Auditor upon resignation, in<br>the format as specified in Annexure- A<br>in SEBI Circular<br>CIR/CFD/CMD1/114/2019 dated 18th<br>October, 2019.   | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |

(a) (\*\*) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified-

| S.<br>No. | Compliance<br>Requirement<br>(Regulations/<br>circulars/guid<br>elines<br>including<br>specific<br>clause) | Regula<br>tion/<br>Circula<br>r No. | Deviat<br>ions | Action<br>taken<br>By | Type<br>of<br>action | Detail<br>s of<br>Violati<br>on | Fin<br>e<br>Am<br>oun<br>t | Obser<br>vation<br>s/Re<br>marks<br>of the<br>Practi<br>cing | Man<br>age<br>men<br>t<br>Resp<br>onse | Rem<br>arks |
|-----------|--|-------------------------------------|----------------|-----------------------|----------------------|---------------------------------|----------------------------|--|--|-------------|
|           | NIL  |                                     |                |                       |                      |                                 |                            |  |  |             |



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

| S.  | Compliance     | Regula  | Deviat | Action | Туре   | Detail  | Fin | Obser  | Man  | Rem   |
|-----|----------------|---------|--------|--------|--------|---------|-----|--------|------|-------|
| No. | Requirement    | tion/   | ions   | taken  | of     | s of    | е   | vation | age  | arks  |
|     | (Regulations/  | Circula |        | Ву     | action | Violati | Am  | s/Re   | men  | ć     |
|     | circulars/guid | r No.   |        |        |        | on      | oun | marks  | t    |       |
|     | elines         |         |        |        | ~      |         | t   | of the | Resp |       |
|     | including      |         |        |        |        |         |     | Practi | onse |       |
|     | specific       |         |        |        |        |         |     | cing   |      |       |
| •   | clause)        |         |        |        |        |         |     |        |      | 1. A. |
|     |                |         |        |        | NIL    |         |     |        |      |       |

Place: New Delhi Date: 18 - May - 2023 UDIN: F008493E000330540 Peer Review: 2105/2022 For KKS & ASSOCIATES Company Secretaries Krishna Kumar Singh Proprietor M. No. 8493



South West Pinnacle Exploration Ltd (Formerly known as South West Pinnacle Exploration Pvt Ltd) CIN NO.: L13203HR2006PLC049480 <u>Regd & Corp Office</u>: Ground Floor, Plot No.15, Sector-44, Gurgaon 122003, Haryana, India. T: +91 124 4235400, 4235401 F: +91 124 4235402 E: info@southwestpinnacle.com W: www.southwestpinnacle.com

Date: 24.01.2024

To, Listing Department Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers, Dalal Street Mumbai-400001 Script Code: 543986

### Sub: Clarification on applicability of requirement for submission of Quarterly SDD Certificate by the company

Dear Sir/Madam,

In reference to your mail dated January 24, 2024 regarding non submission of SDD Compliance Certificate by the company for the quarter ended December 31, 2023.

We wish to clarify here that the provisions of Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulations 2015 i.e for Secretarial Audit and Secretarial Compliance Report is applicable on us and the company has duly obtained the Annual Secretarial Compliance report from a Practicing Company Secretarial Firm named as M/s KKS & Associates dated May 18, 2023. (The copy of the same is duly attached as Annexure-I)

Further as per BSE Circular vide 20230329-21 issued dated March 29, 2023 the listed entities to whom the provisions of Regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 are not applicable are required to continue to submit SDD Compliance certificate on quarterly basis, within 21 days from end of each quarter. (The copy of the same is duly attached as Annexure-II). Therefore, the requirement for submission of SDD Compliance Certificate for the quarter ended December 31, 2023 is not applicable on us.

Also, please be note that the company has been listed on BSE w.e.f October 05, 2023 and the company is already in compliance with the said requirement and duly submitted the Annual Secretarial Compliance Report on National Stock Exchange of India (Listed since 2019) for the year ended March 31, 2023.

Hope this clarify the matter. Thanking You

For South West Pinnacle Exploration Limited



Vaishali Company Secretary & Compliance Officer

### **Annexure-I**



South West Pinnacle Exploration Ltd (Formerly known as South West Pinnacle Exploration Pvt Ltd) CIN NO.: L13203HR2006PLC049480 <u>Regd & Corp Office:</u> Ground Floor, Plot No.15, Sector-44, Gurgaon 122003, Haryana, India. T: +91 124 4235400, 4235401 F: +91 124 4235402 E: info@southwestpinnacle.com W: www.southwestpinnacle.com

#### Date: 19.05.2023

Τo,

Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051

Symbol: SOUTHWEST

# Sub: Submission of Annual Secretarial Compliance Report for the Year ended March 31, 2023 under regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

Respected Sir/ Madam,

Pursuant to regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith "Annual Secretarial Compliance Report" of the company for the Year ended March 31, 2023 issued by M/s KKS & Associates, Practicing Company Secretary for your kind perusal.

This is for your information and records.

**Thanking You** 

### For South West Pinnacle Exploration Limited

VAISHALI Date: 2023.05.19 11:21:35 +05'30'

Vaishali Company Secretary & Compliance Officer

Encl: as above



Mob.: 91-9811687001 E-mail ID : kksinghcs@gmail.com kksandassociates@gmail.com

### ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/S SOUTH WEST PINNACLE EXPLORATION LIMITED (CIN: L13203HR2006PLC049480) FOR THE YEAR ENDED 31st MARCH, 2023

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and NSE Circular NSE/CML/2023/21 dated March 16, 2023 and Circular Ref No: NSE/CML/ 2023/30 dated April 10, 2023]

We, have examined:

- (a) all the documents and records made available to us and explanation provided by M/s South West Pinnacle Exploration 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,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 since there were no events requiring compliance during the Review Period);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018(Not Applicable since there were no events requiring compliance during the Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (Not Applicable since there were no events requiring compliance during the Review Period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(Not Applicable since there were no events requiring compliance during the Review Period);



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- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013(Not Applicable since there were no events requiring compliance during the Review Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018;

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

| Sr. No | Particulars  | Compliance<br>Status<br>(Yes/No/NA) | Observations/Re<br>marks by PCS |
|--------|--|-------------------------------------|---------------------------------|
| 1      | Secretarial Standards:   |                                     |                                 |
|        | The compliances of the listed entity are in<br>accordance with the applicable Secretarial<br>Standards (SS) issued by the Institute of<br>Company Secretaries India (ICSI)                             | Yes                                 |                                 |
| 2      | Adoption and timely updation of the  |                                     |                                 |
|        | <ul> <li>Policies:</li> <li>All applicable policies under SEBI<br/>Regulations are adopted with the<br/>approval of board of directors of the<br/>listed entities</li> </ul>                           | Yes                                 |                                 |
|        | <ul> <li>All the Policies are in conformity<br/>with SEBI Regulations and have<br/>been reviewed &amp; updated on time,<br/>as per the regulations/circulars/<br/>guidelines issued by SEBI</li> </ul> | Yes                                 |                                 |
| 3      | Maintenance and disclosures on Website:  |                                     |                                 |
|        | <ul> <li>The Listed entity is maintaining a<br/>functional website</li> </ul>  | Yes                                 |                                 |
|        | <ul> <li>Timely dissemination of the<br/>documents/ information under a<br/>separate section on the website</li> </ul>   |                                     |                                 |
|        | <ul> <li>Web-links provided in annua</li> </ul>  |                                     |                                 |

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|   | corporate governance report under<br>Regulation 27(2) are accurate and<br>specific which re- directs to the<br>relevant document(s)/section of<br>the website  | Yes       |  |
|---|--|-----------|--|
| 4 | Disqualification of Director:<br>None of the Director(s) of the Company<br>is/are disqualified under Section 164 of<br>Companies Act, 2013 as confirmed by the<br>listed entity.   | Yes       |  |
| 5 | Details related to Subsidiaries of listed<br>entities have been examined w. r. t :<br>(a) Identification of material subsidiary<br>companies<br>(b) Disclosure requirement of material as<br>well as other subsidiaries  | No<br>N/A | Listed entity does<br>not have any<br>material<br>subsidiary,<br>however it has<br>one (1) wholly<br>owned subsidiary<br>M/s Pilot<br>Pipelines private<br>Limited and one<br>(1) subsidiary M/s<br>South west oil<br>field services<br>Private Limited. |
| 6 | Preservation of Documents:<br>The listed entity is preserving and<br>maintaining records as prescribed under<br>SEBI Regulations and disposal of records as<br>per Policy of Preservation of Documents<br>and Archival policy prescribed under SEBI<br>(LODR) Regulations, 2015. | Yes       |  |
| 7 | Performance Evaluation:<br>The listed entity has conducted<br>performance evaluation of the Board,<br>Independent Directors and the Committees<br>at the start of every financial year/during  | Yes       |  |

C. S. ASSOCIAL C. S. ASSOCIAL C. S. C. A. C. A. C. A. C. A. C. P. No. 9760 ★ (CP No. 9760) ★ (CP No. 9760) ★ DW MYSECR

|    | the financial year as prescribed in SEBI<br>Regulations.  |  |  |
|----|---|--|--|
| 8  | Related Party Transactions:   | ing a second |  |
|    | <ul> <li>(a) The listed entity has obtained prior<br/>approval of Audit Committee for all related<br/>party transactions; or</li> <li>(b) The listed entity has provided detailed</li> </ul>          | Yes  |  |
|    | reasons along with confirmation whether<br>the transactions were subsequently<br>approved/ratified/rejected by the Audit<br>Committee, in case no prior approval has<br>been obtained.                | NA   | Prior approval was<br>taken for all<br>Related Party<br>Transaction  |
| 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<br>Regulation 3(5) &3(6) SEBI (Prohibition of<br>Insider Trading) Regulations, 2015.  | Yes  |  |
| 11 | Actions taken by SEBI or Stock<br>Exchange(s), if any:  |  | As informed by<br>the management,<br>no actions were   |
|    | No action(s) has been taken against the<br>listed entity/its promoters/ directors/<br>subsidiaries either by SEBI or by Stock<br>Exchanges (including under the Standard                              | Yes  | taken against the<br>company/ its<br>promoters/<br>directors/  |
|    | Operating Procedures issued by SEBI<br>through various circulars) under SEBI<br>Regulations and circulars/guidelines issued<br>thereunder except as provided under<br>separate paragraph herein (**). |  | subsidiaries either<br>by SEBI or by BSE<br>under SEBI<br>regulations and<br>circulars/<br>Guidelines issued |



|    |  |     | there under during<br>the year under<br>review.   |
|----|--|-----|---|
| 12 | Additional Non-compliances, if any:<br>No additional non-compliance observed for<br>any SEBI regulation/circular/guidance note<br>etc. | Yes | No additional non-<br>compliances were<br>observed for any<br>SEBI regulation/<br>Circular/ Guidance<br>note etc. during<br>the year under<br>review. |

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

| Sr. No. | Particulars  | Compliance Status<br>(YES/NO/NA) | Observations<br>/Remarks by<br>PCS  |  |  |  |  |  |
|---------|--|----------------------------------|---|--|--|--|--|--|
| 1       | Compliances with the following conditions while appointing/re-appointing an auditor  |                                  |   |  |  |  |  |  |
|         | i.If the auditor has resigned within 45<br>days from the end of a quarter of a<br>financial year, the auditor before such<br>resignation, has issued the limited<br>review/ audit report for such quarter;<br>or   | NA                               |   |  |  |  |  |  |
|         | ii. 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                               | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year |  |  |  |  |  |
|         | iii. If the auditor has signed the limited<br>review/ audit report for the first three<br>quarters of a financial year, the<br>auditor before such resignation, has<br>issued the limited review/ audit report<br>for the last quarter of such financial<br>year as well as the audit report for<br>such financial year. | NA                               | under review.   |  |  |  |  |  |
|         |  |                                  |   |  |  |  |  |  |



| 2 | Other conditions relating to resignation of statutory auditor  |    |  |  |  |  |  |  |  |
|---|--|----|--|--|--|--|--|--|--|
|   | i. Reporting of concerns by Auditor<br>with respect to the listed entity/its<br>material subsidiary to the Audit<br>Committee:   | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |  |
|   | a. In case of any concern with<br>the management of the listed<br>entity /material subsidiary<br>such as non-applicability of<br>information /non- cooperation<br>by the management which has<br>hampered the audit process,<br>the auditor has approached<br>the Chairman of the Audit<br>Committee of the listed entity<br>and the Audit committee shall<br>receive such concern directly<br>and immediately without<br>specifically waiting for the<br>quarterly Audit Committee<br>meetings.     | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |  |
|   | b. In case the auditor proposes<br>to resign all concerns with<br>respect to the proposed<br>resignation, along with<br>relevant documents has been<br>brought to the notice of the<br>Audit Committee. In cases<br>where the proposed<br>resignation is due to non-<br>receipt of information /<br>explanation from the<br>company, the auditor has<br>informed the Audit Committee<br>the details of<br>information/explanation<br>sought and not provided by<br>the management, as<br>applicable. | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |  |  |  |  |  |  |

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|   | <ul> <li>c. 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.</li> <li>ii. Disclaimer in case of non-receipt of</li> </ul> | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |   |
|---|---|----|--|---|
|   | information:<br>The auditor has provided an<br>appropriate disclaimer in its audit<br>report, which is in accordance<br>with the Standards of Auditing<br>specified by ICAI / NFRA, in case<br>where the listed entity/ its<br>material subsidiary has not<br>provided information as required<br>by the auditor.                   | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. |   |
| 3 | The listed entity / its material<br>subsidiary has obtained information<br>from the Auditor upon resignation, in<br>the format as specified in Annexure- A<br>in SEBI Circular<br>CIR/CFD/CMD1/114/2019 dated 18th<br>October, 2019.  | NA | There was no<br>such event in the<br>listed entity &<br>material<br>subsidiaries<br>during the year<br>under review. | - |

(a) (\*\*) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified-

| S.<br>No. | Compliance<br>Requirement<br>(Regulations/<br>circulars/guid<br>elines<br>including<br>specific<br>clause) | Regula<br>tion/<br>Circula<br>r No. | Deviat<br>ions | Action<br>taken<br>By | Type<br>of<br>action | Detail<br>s of<br>Violati<br>on | Fin<br>e<br>Am<br>oun<br>t | Obser<br>vation<br>s/Re<br>marks<br>of the<br>Practi<br>cing | Man<br>age<br>men<br>t<br>Resp<br>onse | Rem<br>arks |
|-----------|--|-------------------------------------|----------------|-----------------------|----------------------|---------------------------------|----------------------------|--|--|-------------|
|           | clausej  |                                     | 1              |                       | NIL                  |                                 |                            |  |  |             |



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

| S.  | Compliance     | Regula  | Deviat | Action | Туре   | Detail  | Fin | Obser  | Man  | Rem  |
|-----|----------------|---------|--------|--------|--------|---------|-----|--------|------|------|
| No. | Requirement    | tion/   | ions   | taken  | of     | sof     | е   | vation | age  | arks |
|     | (Regulations/  | Circula | -      | Ву     | action | Violati | Am  | s/Re   | men  | 7    |
|     | circulars/guid | r No.   |        |        |        | on      | oun | marks  | t    |      |
|     | elines         |         |        |        | ~      |         | t   | of the | Resp |      |
|     | including      |         |        |        |        |         |     | Practi | onse |      |
|     | specific       |         | 1      |        |        |         |     | cing   |      |      |
|     | clause)        |         |        |        |        |         |     |        |      | . e  |
|     | NIL            |         |        |        |        |         |     |        |      |      |

Place: New Delhi Date: 18 - May - 2023 UDIN: F008493E000330540 Peer Review: 2105/2022 For KKS & ASSOCIATES Company Secretaries Krishna Kumar Singh Proprietor M. No. 8493



# Date of

19-May-2023

# NSE Acknowledgement

| Symbol:-               | SOUTHWEST                               |  |  |  |
|------------------------|---|--|--|--|
| Name of the Company: - | South West Pinnacle Exploration Limited |  |  |  |
| Submission Type:-      | Announcements                           |  |  |  |
| Short Description:-    | Annual Secretarial Compliance Report    |  |  |  |
| Date of Submission:-   | 19-May-2023 11:27:01 AM                 |  |  |  |
| NEAPS App. No:-        | 2023/May/11132/11190                    |  |  |  |

Disclaimer : We hereby acknowledge receipt of your submission through NEAPS. Please note that the content and information provided is pending to be verified by NSEIL.

Notice Number



This is with reference to Regulation 3(5) and 3(6) of SEBI (PIT) Regulations, 2015 which inter alia required SDD to be maintained by the company. In this regard, the Exchange has issued following circulars inter alia Specifying timelines for submission of SDD Compliance certificate and action to be taken against companies which are found to be non-complaint with above mentioned Regulations:

1) Circular No. 20221028-15 and 20221028-16 dated October 28, 2022 specifying timelines for submission of SDD Compliance Certificate for the quarter ended September 30, 2022 and December 31, 2022.

2) Circular No. 20221104-37 dated November 04, 2022 specifying consequences of non-compliance with the requirements of Reg 3(5) and 3(6) specifies consequences of non-compliance with the requirements of Reg 3(5) and 3(6) of SEBI (PIT) Regulations, 2015.

3) Circular No. 20230125-33 dated January 25, 2023 specifying consequences of non-compliance with the requirements of Reg 3(5) and 3(6) of SEBI (PIT) Regulations, 2015.

4) Circular No. 20230316-14 dated March 16, 2023 specifying Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR).

In continuation to the aforementioned Exchange circulars, the listed entities are advised to take a note that the listed entities to whom the provisions of Regulation 24A of SEBI(LODR) Regulations, 2015 are not applicable, are required to continue to submit SDD Compliance certificate on guarterly basis, within 21 days from end of each guarter on the below mentioned path:

BSE Listing Centre > Listing Compliance > Compliance Module > Structured Digital Database (SDD) Compliance Certificate

The circular shall be effective immediately.

All Listed companies are requested to take note and comply accordingly.

Ashok kumar Singh DGM-Listing Compliance Yash Gala Assistant Manager-Listing Compliance

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1/29/24, 5:31 PM

Communication History

**Listing Center** History Subject / Regulation SDD Non-Compliance (Communication Type): Period: 31/12/2023 **Listing Operations** Dear Sir/Madam, This is with reference to Exchange Circular dated March 29, 2023. It has been observed that the company was required to submit quarterly SDD Compliance Certificate for December 31, Listing Compliance 2023 guarter. However, till date the company has not submitted the said certificate. The due date to submit the said quarterly SDD Administration Query/MIS/Discrepancy: Compliance Certificate for December 31, 2023 quarter was January 21, 2024. The company is advised to submit the same latest by Monday i.e. January 29, 2024. Failing which the company shall be Management Details

company.

Company Name Message Date Download South West Clarification on applicability of requirement for submission of Pinnacle Quarterly SDD Certificate by the company. The reply of the 24/01/2024 ¥ Exploration Ltd company is attached for reference of the exchange FAQs for updation of The acknowledgement of submission of ASCR submitted by information on BSE Exchange company is of NSE. Company is advised either to file ASCR 25/01/2024 8 Remarks Report or SDD Compliance Certificate at BSE. South West The reply of the company along with ASCR is attached for the 29/01/2024 ¥ Pinnacle reference of the exchange Exploration Ltd

treated as SDD Non-Compliant and actions as prescribed in Exchange circular dated January 25, 2023 shall be initiated on the

Help Desk

website

User Manual

**Communication Module** 

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https://listing.bseindia.com/CommHistory.aspx

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