PANTH INFINITY LIMITED

CIN: L45201GJ1993PLC114416

Registered Office: 32, Rajsukh complex , Behind Hyatt Regency Lane, Opp. Gujarat Vidyapith, Income tax, Ashram road, Navjivan, Ahmedabad, Gujarat, India, 380014.

Corporate Office: 828/829, 4th Floor, Office-4,Shree Kuberji Complex Athugar Street, Nanpura Main Road, Surat, Gujarat, India, 395001.

E-mail: panthinfinitylimited@gmail.com; **(M) -** +91 7383983840

Date: July 30, 2025

To,
BSE Limited
Phiroze Jeejbhoy Tower,
Dalal Street,
Mumbai – 400001

Dear Sir/Madam,

Subject: **Submission of Annual Secretarial Compliance Report for the year ended on March 31, 2025**

Reference: **Panth Infinity Limited (Security ID: PANTH, Security Code: 539143, ISIN: INE945O01019)**

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are submitting herewith Annual Secretarial Compliance Report of the Company for the year ended on March 31, 2025, issued by M/s. Alap & Co. LLP (LLPIN: ACA-1561), Practicing Company Secretaries (FRN: L2023GJ013900).

Kindly take the same on your record and disseminate the same on your website and oblige us.

You are requested to kindly take the above information on record.

For, **Panth Infinity Limited**

NILESH DEVENDRAPRASAD DAVE

Digitally signed by NILESH DEVENDRAPRASAD DAVE
DN: c=IN, o=Personal, postalCode=380013, l=Ahmedabad, st=Gujarat, street=76/904, Ambica Apparment Naranpura, Ahmedabad City, Ahmedabad City Gujarat India- 380013-, title=6728, 2.5.4.20=5771a889b5097e5833a2023c9739566bb0f141b5b74a3a2350a60e2f3b77251, serialNumber=d5723ec46481498f0d76f62d930c35b35214a0c940fba93f9c515a5246266754, email=fundraising4444@gmail.com, cn=NILESH DEVENDRAPRASAD DAVE
Date: 2025.07.30 13:18:22 +05'30'

PANTH INFINITY LIMITED GUJARAT

Nilesh Devendraprasad Dave
Director
DIN: 10530978

Encl: As Above

SECRETARIAL COMPLIANCE REPORT OF PANTH INFINITY LIMITED

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025

We, M/s. ALAP & CO. LLP, Practicing Company Secretaries (FRN: L2023GJ013900) have examined;

(a) all the documents and records made available to us and explanation provided by PANTH INFINITY LIMITED (CIN: L45201GJ1993PLC114416) ("the listed entity" or "the Company"),

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2025 ("Review Period") in respect of compliance with the provisions of:

(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

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

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

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as 'Listing Regulations');

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; ***(Not applicable to the Company during the Review Period)***

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; ***(Not applicable to the Company during the Review Period)***

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; ***(Not applicable to the Company during the Review Period)***

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 ***(Not applicable to the Company during the Review Period)***

and circulars/ guidelines issued thereunder.

and based on the above examination and explanation / clarification given by the Company and its officers, we hereby report that, during the Review Period,

ALAP & CO. LLP AHMEDABAD

(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	1.	2.	3.	4.	5.	6.	7.
Compliance Requirement (Regulations / circulars /guidelines including specific clause)	Holding of Annual General Meeting of the Members of the listed entity within period of 6 (Six) Months from the end of Financial Year 2023-24 and consequently submission of Annual Report for financial year 2023-24.	Statutory Auditor resigns after 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter as well as the next quarter.	Every listed entity shall appoint a qualified company secretary as the compliance officer.	The financial results shall be signed by the chairperson or managing director or a whole-time director or in the absence of all of them, it shall be signed by any other director authorized by the board of directors.	The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter.	Every listed entity shall submit Reconciliation of share capital audit report on a quarterly basis, to the concerned stock exchanges audited by a qualified Chartered Accountant or a practicing Company Secretary or a practicing Cost Accountant	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, 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.
Regulation /	Regulation 34 and 36 of SEBI	SEBI Circular No.:	Regulation 6 of SEBI (LODR)	Regulation 33 (2) (b) of SEBI	Regulation 33 (3) (a) of SEBI	Regulation 76 of	Regulation 31(1)(c) of SEBI

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

ALAP & CO. LLP AHMEDABAD

Company Secretaries

Circular No.	(LODR) 2015	CIR/CFD/CMD1 /114/2019	2015	(LODR) 2015	(LODR) 2015	SEBI (DPR) 2018	(LODR) 2015
Deviations	Annual General Meeting of the Members of the Company is not held within period of 6 (Six) Months from the end of Financial Year 2023-24 and consequently annual report for the financial year 2023-24 has not been submitted	Limited Review Report for Q2 2023-24 is not issued by C. P. Jaria & Co. (Outgoing Auditor) and the same has been issued by SSRV & Associates (Incoming Auditor)	Company Secretary is not appointed after November 13, 2024 as company has to fill the same vacancy not later than three months from the date of such vacancy.	The financial results are signed digitally through DSC and not physically signed by managing director in Q1 2023-24.	The company has not filed financial results in due time for the Q1, Q2 and Q3 of Financial year 2023-24.	The company has not filed audit report in due time for the December 31, 2024 and March 31, 2024 of Financial year 2023-24.	The listed entity have not submitted to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, 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.
Action Taken by	Stock Exchange	Nil	Stock Exchange	Nil	Nil	Nil	Nil

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Type of Action	Penalty	Non-Compliance of SEBI Circular No.: CIR/CFD/CMD1 /114/2019	Penalty	Nil	Late-Compliance of Regulation 33 of SEBI (LODR) 2015	Delay in Compliance with provisions of Regulation 76 of SEBI (DPR) 2018	Non - Compliance of Regulation 31(1)(c) of SEBI (LODR) 2015
Details of Violation	Annual General Meeting of the Members of the Company is not held within period of 6 (Six) Months from the end of Financial Year 2023-24 and consequently annual report for the financial year 2023-24 has not been submitted.	Limited Review Report for Q2 2023-24 is not issued by C. P. Jaria & Co. (Outgoing Auditor) and the same has been issued by SSRV & Associates (Incoming Auditor)	Company Secretary is not appointed after November 13, 2024 as company has to fill the same vacancy not later than three months from the date of such vacancy.	The financial results are signed digitally through DSC and not physically signed by managing director in Q1 2023-24.	The company has not filed financial results in due time for the Q1, Q2 and Q3 of Financial year 2023-24.	The company has not filed audit report in due time for the December 31, 2024 and March 31, 2024 of Financial year 2023-24.	The listed entity has not submitted to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, 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.

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Fine Amount	₹5,16,000 + 18% GST	-	₹46,000 + 18% GST	-	-	-	-
Observations / Remarks of the Practicing Company Secretary	Annual General Meeting of the Members of the Company is not held within period of 6 (Six) Months from the end of Financial Year 2023-24. Every listed entity is required to hold annual general meeting within 6 months from the end of the relevant financial year. Further, as per regulation 34 of SEBI (LODR) Regulations, 2015, The listed entity shall submit to the stock exchange	Limited Review Report for Q2 2023-24 is not issued by C. P. Jaria & Co. (Outgoing Auditor) and the same has been issued by SSRV & Associates (Incoming Auditor) and Clarification required from Outgoing Auditor.	Company Secretary is not appointed after November 13, 2024 as company has to fill the same vacancy not later than three months from the date of such vacancy. The listed entity is required to appoint qualified company secretary as compliance officer within three months from the date of casual vacancy.	The financial results are signed digitally through DSC and not physically signed by managing director in Q1 2023-24. The financial results The financial results submitted to the stock exchange shall be signed by the chairperson or managing director, or a whole time director or in the absence of all of them; it shall be signed by any other director of the listed entity who is duly	The company has not filed financial results in due time for the Q1, Q2 and Q3 of Financial year 2023-24. The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter	The company has not filed audit report in due time for the December 31, 2024 and March 31, 2024 of Financial year 2023-24. Every listed entity shall submit Reconciliation of share capital audit report on a quarterly basis, to the concerned stock exchanges audited by a qualified Chartered Accountant or a practicing Company Secretary or a practicing Cost	The Company has filed the same in May 2025. The listed entity was required to submit with the stock exchange(s), a statement showing holding of securities and shareholding pattern separately for each class of securities, within ten days of any capital restructuring of the listed entity resulting in a change exceeding two per cent of the total paid-up

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

ALAP & CO. LLP AHMEDABAD
Company Secretaries

	and publish on its websites copy of the annual report sent to the shareholders along with the notice of the annual general meeting 336[on or before the] commencement of dispatch to its shareholders.			authorized by the board of directors to sign the financial results.		Accountant.	share capital.
Management Response	Management will hold the Annual General Meeting for Financial Year 2023-24 in near future and will pay fine levied by stock exchange after the same.	Limited Review Report for Q2 2023-24 issued by SSRV & Associates (Incoming Auditor)	The Company takes all measures to timely comply with the entire requirement. However, non-submission occurred purely due to oversight and Company ensures to make timely compliance in	Management will take care of minute things in near future and will not repeat the same.	The Company takes all measures to timely comply with the entire requirement. However, non-submission occurred purely due to oversight and Company ensures to make timely compliance in	The Company takes all measures to timely comply with the entire requirement. However, non-submission occurred purely due to oversight and Company ensures to make timely compliance in	Management will take care of the said deadlines and in near future and will not repeat the same.

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

			future.		future.	future.	
Remarks	NA	NA	NA	NA	-	NA	-

Sr. No	8.	9.	10.	11.	12.	13.	14.
Compliance Requirement (Regulations / circulars /guidelines including specific clause)	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, on a quarterly basis, within twenty one days from the end of each quarter.	Submission of Annual Disclosures of Large Corporate for FY 2023-24	The listed entity shall maintain a functional website containing the required information about the listed entity.	The listed entity shall make an application to the exchange/s for listing in case of further issue of equity shares within 20 days from the date of allotment (unless otherwise specified).	The listed entity shall submit, to the recognized stock exchange(s), a quarterly compliance report on corporate governance in the format within 21 days from the end of the quarter.	The listed entity shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of this regulation as soon as reasonably possible and in any case not later than thirty minutes from the closure of the meeting of the board of directors along with annexures mentioned in	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

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

ALAP & CO. LLP AHMEDABAD

Company Secretaries

						Schedule III.	of appointment, whichever is earlier.
Regulation / Circular No.	Regulation 31 (1) (b) of SEBI (LODR) 2015 read with SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P /0155 dated November 11, 2024	Pursuant to SEBI Circular No: SEBI / HO / DDHS / DDHS - RACPOD1 / P / CIR / 2023 / 172 dated October 19, 2023 with regard to fund raising by issuance of	Regulation 46 of SEBI (LODR) 2015	Pursuant to SEBI Circular No: SEBI / HO / CFD / DIL2 / CIR / P / dated August 19, 2019	Regulation 27 (2) of SEBI (LODR) 2015 read with SEBI/HO/CFD/PoD2/CIR/P /0155 dated November 11, 2024.	Regulation 30 of SEBI (LODR) 2015 read with SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated 13th July 2023.	Regulation 17 (1C) of SEBI (LODR) 2015
		debt securities by large entities, we would					

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Company Secretaries

	like to confirm that the Company did not fulfill the criteria specified in Para 3.2 of the above mentioned SEBI Circular for as on March 31, 2023						
Deviations	The listed entity have not submitted to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, on a quarterly basis, within twenty one days from the end of each quarter i.e. for June 30, 2024 and December	Non filing of Annual Disclosure s of Large Corporate for FY 2023-24	The listed entity have not maintain a functional website containing the required	The listed entity have not made an applicatio n to the exchange/ s for listing in case of	The listed entity has not submitted, to the recognized stock exchange(s), a quarterly compliance report on corporate governance for the quarter ended on December 31, 2024 within 21 days from the end of the quarter.	The listed entity have not disclosed to the stock exchange(s), all the details as required under SEBI circular SEBI/HO/CFD/C FD-PoD-1/P/CIR/2023/12	The listed entity has not approved an regularized an appointments of Mr. Akshay Sudam Sangle, Mr.

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

	31, 2024.		information about the listed entity.	further issue of equity shares within 20 days from the date of allotment (unless otherwise specified).		3 dated 13th July 2023 with respect to appointment of appointment of M/s. Mukesh J & Associates, Ahmedabad, Practicing Company Secretary as a Secretarial Auditor of the Company for the F.Y 2023-24.	Nilesh Devendraprasad Dave and Ms. Jigna Jigarkumar Shah, as directors of the company.
Action Taken by	Stock Exchange	Nil	Nil	Nil	Stock Exchange	Nil	Nil
Type of Action	Penalty	Nil	Non - Compliance of Regulation 46 of SEBI (LODR) 2015	Penalty	Penalty	Non - Compliance of Regulation 30 of SEBI (LODR) 2015	Non – Compliance of Regulation 17 (1C) of SEBI (LODR) 2015
Details of Violation	The listed entity has not submitted to the stock	Non filing of Annual	The listed entity	The listed entity	The listed entity has not submitted, to the recognized	The listed entity have not disclosed	The listed entity has not

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Company Secretaries

	exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, on a quarterly basis, within twenty one days from the end of each quarter i.e. for June 30, 2024 and December 31, 2024.	Disclosures of Large Corporate for FY 2023-24	have not maintain a functional website containing the required information about the listed entity.	have not made an application to the exchange/s for listing in case of further issue of equity shares within 20 days from the date of allotment (unless otherwise specified) for Seven Allotments.	stock exchange(s), a quarterly compliance report on corporate governance for the quarter ended on December 31, 2024 within 21 days from the end of the quarter.	to the stock exchange(s), all the details as required under SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated 13th July 2023 with respect to appointment of appointment of M/s. Mukesh J & Associates, Ahmedabad, Practicing Company Secretary as a Secretarial Auditor of the Company for the F.Y 2023-24.	approved an regularized an appointments of Mr. Akshay Sudam Sangle, Mr. Nilesh Devendraprasad Dave and Ms. Jigna Jigarkumar Shah, as directors of the company.
Fine Amount	₹4,000 + 18% GST	Nil	Nil	₹37,40,000 + GST	₹60,000 + GST	Nil	Nil
Observatio	The listed entity has not	Non filing	The listed	The listed	The listed entity has not	The listed entity	The listed

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

ns / Remarks of the Practicing Company Secretary	submitted to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, on a quarterly basis, within twenty one days from the end of each quarter i.e. for June 30, 2024 and December 31, 2024. The Company has filed the same in July 24, 2024 and March 19, 2025 respectively. The listed entity was required to submit with the stock exchange(s), a statement showing holding of securities and shareholding pattern separately for each class of securities, 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.	of Annual Disclosures of Large Corporate for FY 2023-24. The Company was required to submit annual disclosure of large corporate within 45 days from the end of the relevant financial year.	entity have not maintain a functional website containing the required information about the listed entity. Every listed entity shall maintain a functional website containing the basic information about the listed entity.	entity have not made an application to the exchange/s for listing in case of further issue of equity shares within 20 days from the date of allotment (unless otherwise specified) for Seven Allotments. The Company has filed the same in May	submitted, to the recognized stock exchange(s), a quarterly compliance report on corporate governance for the quarter ended on December 31, 2024 within 21 days from the end of the quarter. The Company has filed the same in March 18, 2025 but **NOT PAID** the above mentioned fine. Every listed entity is required submit, to the recognized stock exchange(s), a quarterly compliance report on corporate governance in the format within 21 days from the end of the quarter.	have not disclosed to the stock exchange(s), all the details as required under SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated 13th July 2023 with respect to appointment of appointment of M/s. Mukesh J & Associates, Ahmedabad, Practicing Company Secretary as a Secretarial Auditor of the Company for the F.Y 2023-24. The listed entity is required to disclose all the information or details which are	entity has not approved an regularized an appointments of Mr. Akshay Sudam Sangle, Mr. Nilesh Devendraprasad Dave and Ms. Jigna Jigarkumar Shah, as directors of the company. The Listed entity is required to obtained an approval of appointment or re-appointment of a person on the Board of Directors

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off.; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

				2025 and paid the same fine.		material in terms of Regulation 30 of SEBI (LODR) Regulations, 2015 read with SEBI circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated 13th July 2023.	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.
Management Response	Management will take care of the said deadlines and in near future and will not repeat the same.	Management will take care of the said deadlines and in near future and will not repeat the same.	Management will take care of the said deadlines and in near future and will not repeat the same.	Management will take care of the said deadlines and in near future and will not repeat the same.	Management will take care of the said deadlines and in near future and will not repeat the same	Management will take care of the said deadlines and in near future and will not repeat the same.	Management will hold the Annual General Meeting for Financial Year 2023-24 in near future and will regularized All ID's by the approval of shareholders

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

ALAP & CO. LLP AHMEDABAD
Company Secretaries

							in the same AGM after the same.
Remarks	NA	NA	NA	NA	NA	NA	NA

Sr. No	9.	10.	11.	12.	13.	14.	15.
Compliance Requirement (Regulations / circulars /guidelines including specific clause)	If the auditor resigns within 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter. Further, f the auditor resigns after 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter as well as the next quarter.	Every listed entity shall have 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.					
Regulation /	SEBI Circular No.	Regulation 17(1) of SEBI (LODR)					

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Circular No.	CIR/CFD/CMD1/114/2019 dated October 18, 2019	Regulations, 2015 read with SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024					
Deviations	M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W) has resigned w.e.f 22nd August, 2024 i.e. after 45 days from the end of the quarter. Further, M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) has been appointed as statutory auditor w.e.f. November 11, 2024 to fill the casual vacancy. Limited review report for the quarter ended on September 30, 2024 has been given by M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) instead of M/s. C.P. JARIA & CO., Chartered	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director.					

ALAP & CO. LLP AHMEDABAD

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

	Accountants (Firm Registration No. 104058W).							
Action Taken by	Nil	Stock Exchange						
Type of Action	Non-compliance with SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.	Penalty						
Details of Violation	M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W) has resigned w.e.f 22nd August, 2024 i.e. after 45 days from the end of the quarter. Further, M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) has been appointed as statutory auditor w.e.f. November 11, 2024 to fill the casual vacancy. Limited review report for the quarter ended on September 30, 2024 has been	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director.						

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

	given by M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) instead of M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W).						
Fine Amount	Nil	₹4,45,000 + 18% GST					
Observations / Remarks of the Practicing Company Secretary	M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W) has resigned w.e.f 22nd August, 2024 i.e. after 45 days from the end of the quarter. Further, M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) has been appointed as statutory auditor w.e.f. November 11, 2024 to fill the casual vacancy. Limited review report for the quarter ended on September 30, 2024 has been	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director. According to regulation 17(1) of SEBI (LODR) Regulations, 2015, the 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.					

Company Secretaries

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off.: 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

	given by M/s. SSRV and Associates, Chartered Accountants, Mumbai (Firm Registration No. 135901W) instead of M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W).						
Management Response	Management will take care of the said deadlines and in near future and will not repeat the same. If the auditor resigns after 45 days from the end of a quarter of a financial year, then the auditor shall, before such resignation, issue the limited review/ audit report for such quarter as well as the next quarter.	The Company takes all measures to timely comply with the entire requirement. However, non-submission occurred purely due to oversight and Company ensures to make timely compliance in future.					
Remarks	NA	NA					

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

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite
Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Sr. No.	1.	2.	3.	4.	5.	6.
Observations/ Remarks of the Practicing Company Secretary in the previous reports	The Company being Listed Company has not filled the vacancy in the office of Company Secretary and Compliance Officer within three months from the date of such vacancy.	The company has not filed Reconciliation of share capital audit report in due time for the quarter ended on March 31, 2024.	There was delayed Newspaper Publication of unaudited financial results for the quarter ended on June 30, 2023.	There is a Delayed submission of Proceedings of Annual General Meeting as required under regulation 30(6) read with Schedule III of SEBI (LODR) Regulations, 2015.	Non-appointment of independent director to fill the casual vacancy caused by resignation of existing independent director during the period from 01-08-2023 to 02-03-2024.	The Company has delayed submission of information with designated depository.
Observations made in the secretarial compliance report for the year ended	March 31, 2024	March 31, 2024	March 31, 2024	March 31, 2024	March 31, 2024	March 31, 2024

ALAP & CO. LLP AHMEDABAD

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

compliance Requirement (Regulations/circulars/ guidelines including specific clause)	The Company being Listed Company should appoint one Company Secretary and Compliance Officer of the Company.	Every listed entity shall submit Reconciliation of share capital audit report on a quarterly basis, to the concerned stock exchanges audited by a qualified Chartered Accountant or a practicing Company Secretary or a practicing Cost Accountant.	Newspaper of Publication of Financial Results should be made within 48 hours of conclusion of the meeting of the board of directors.	The Listed Entity has to submit Proceedings of the General Meetings of the Company within 12 hours of completion of said meetings.	The Company being Listed Company has to fill the vacancy in the office of Independent Director for a period from 01-08-2023 to 02-03-2024.	System Driven Disclosures in Securities market upto two level below CEO of a company.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	The Company being Listed Company has not filled the vacancy in the office of Company Secretary and Compliance Officer within three months from the date of such vacancy.	The Company has not submitted Reconciliation of share capital audit report on a quarterly basis, to the concerned stock exchanges audited by a qualified Chartered Accountant or a practicing Company Secretary or a practicing Cost Accountant.	There was delayed Newspaper of Publication of unaudited financial results for the quarter ended on June 30, 2023.	There is a Delayed submission of Proceedings of Annual General Meeting as required under regulation 30(6) read with Schedule III of SEBI (LODR) Regulations, 2015.	Non-appointment of independent director to fill the casual vacancy caused by resignation of existing independent director during the period from 01-08-2023 to 02-03-2024.	The Company has delayed submission of information with designated depository.

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

Remedial actions, if any, taken by the listed entity	The Company has appointed Ms. Shalu Garg on November 08, 2023 and paid Rs. 38,000 + GST as Fine for the said Non – Compliance.	The Company has submitted audit report on a quarterly basis on a later date to Stock Exchange.	The Company has ensured due compliance of the same in future and has taken due action order to ensure timely compliance in future.	The Company has ensured due compliance of the same in future and has taken due action order to ensure timely compliance in future.	The Company has ensured due compliance of the same in future and has taken due action order to ensure timely compliance in future.	The Company has ensured due compliance of the same in future and has taken due action order to ensure timely compliance in future.
Comments of the PCS on the actions taken by the listed entity	Nil	Nil	Nil	Nil	Nil	Nil

A Limited Liabilities Partnership Firm (LLPIN: ACA-1561)
Regd. Off. ; 416, 4th Floor, Shreenathji Staff Co. Op. Soc. Ltd, Pushpam Complex, Opp. Seema Hall, 100 feet Ring Road, Satellite Jodhpur Char Rasta, Ahmedabad, Gujarat - 380 015
Email: alapandcollp@gmail.com; **Phone:** +91 7935789144; **Mobile No.:** +91 94270 49481 / 97270 18426

(c) we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI),as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Nil
2.	**Adoption and timely updation of the Policies:**		
	• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	Policies are not updated as per latest amendments in relevant regulations.
	• All the policies are in conformity with SEBI Regulations and have been reviewed & updated, as per the regulations / circulars / guidelines issued by SEBI	No	Policies are not updated as per latest amendments in relevant regulations.
3.	**Maintenance and disclosures on Website:**		
	• The Listed entity is maintaining a functional website	No	The Company has not updated functional website as required under of the regulation 46 SEBI (LODR) Regulation, 2015
	• Timely dissemination of the documents/ information under a separate section on the website	No	The Company has not updated functional website as required under of the regulation 46 SEBI (LODR) Regulation, 2015
	• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s) / section of the website	No	The Company has not updated functional website as required under of the regulation 46 SEBI (LODR) Regulation, 2015
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are	Yes	We have relied on the Declarations submitted by each of the Directors

ALAP & CO. LLP AHMEDABAD

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS
	disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.		regarding non-disqualification under Section 164 of the Companies Act, 2013.
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:**		
	(a) Identification of material subsidiary companies	NA	The Company does not have any Material Subsidiary.
	(b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company does not have any other Subsidiary.
6.	**Preservation of Documents:** The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Nil
7.	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	No	Nil
8.	**Related Party Transactions:**		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	Nil
	(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.	NA	The Company has obtained prior approval of Audit Committee for all related party transactions
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	No	Except as referred in Sr. No. 1 in Table (a) above.

ALAP & CO. LLP AHMEDABAD

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations / Remarks by PCS
	within the time limits prescribed thereunder.		
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The Company has not maintained structural digital database under the provisions of Reg. 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015, in digital form.
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBIor by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	As informed to us, except as stated above, no action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges etc.
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries** In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	M/s. C.P. JARIA & CO., Chartered Accountants (Firm Registration No. 104058W), an existing Statutory Auditor of the Company has resigned from the company as on August 22, 2024 i.e. after completion of 45 days from the Q2 2024-25, so the said auditor will have to issue LRR for Q2 and Q3 as per SEBI circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019, however, LRR for Q2 and Q3 is issued by new statutory auditor, which is treated as non-compliance of the said SEBI circular. As stated above
13.	**No additional non-compliances observed:** No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	No	

Further in terms of SEBI Circular no SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024 in respect requirement of disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of Listing Regulations- ***Not applicable to the Company during the Review Period;***

Our report is limited to scope and review as under;

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.
5. We have followed the best possible practices and process as considered appropriate to obtain reasonable assurance about the correctness of the contents of the relevant secretarial records. The verification as done on test basis is to reasonably ensure that correct facts are reflected in relevant secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
6. We have limited our review, analysis and reporting up to process and system adopted by the Company for compliance with the same and have not verified detailed compliance, submissions, reporting under such laws etc. nor verified correctness and appropriateness thereof.
7. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

For, ALAP & Co. LLP
Company Secretaries
Firm Registration Number: L2023GJ013900
Peer Review Number: 5948/2024

ALAP & CO. LLP AHMEDABAD

Anand Lavingia
Designated Partner
DIN: 05123678
M. No.: A26458; COP: 11410
UDIN: A026458G000504067

Date: May 30, 2025
Place: Ahmedabad