

SHRI GANG INDUSTRIES AND ALLIED PRODUCTS LIMITED

Corporate office: F-32/3, Okhla Industrial Area, Phase- II, New Delhi- 110020

Reg Off & Works- Plot No B-2/6, B-2/7, UPSIDC Industrial Area- Phase IV, Sandila, Distt Hardoi, U.P-241204

Sikandrabad Works: - Plot No B-2/6, B-2/7, UPSIDC Industrial Area- Phase IV, Sandila, Distt Hardoi, U.P.

E. id:-secretarial@shrigangindustries.com **website:-**www.shrigangindustries.com Tel No: 011-42524454/99

May 29, 2025

To
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

Scrip Code: 523309

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended March 31, 2025.

Dear Sir/Madam,

Pursuant to Regulation 24A(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with the applicable circulars issued by the Securities and Exchange Board of India and BSE Limited, please find enclosed herewith the Annual Secretarial Compliance Report of Shri Gang Industries and Allied Products Limited for the year ended March 31, 2025.

Kindly take note of the same and acknowledge the receipt thereof.

Thanking you,
Yours truly,
For Shri Gang Industries and Allied Products Limited

Kanishka Jain
(Company Secretary & Compliance Officer)

Encl.: as above

MONIKA KOHLI

B.Com. (H) F.C.S, L.L.B., I.P.

SECRETARIAL COMPLIANCE REPORT OF SHRI GANG INDUSTRIES AND ALLIED PRODUCTS LIMITED FOR THE YEAR ENDED 31 MARCH 2025

(Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

We have examined:

- (a) all the documents and records made available to us and explanation provided by **SHRI GANG INDUSTRIES AND ALLIED PRODUCTS LIMITED (CIN L11011UP1989PLC011004)** (“the listed entity”) having its registered office at Plot No. B-2/6 & 2/7, UPSIDC Industrial Area, Sandila Phase IV, SandilaHardoi, UP 241204
- (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 March, 2025 (Review Period) in respect of compliance with the provisions of:

- (a) Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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 (including amendments therein), 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 “**SEBI LODR**”);
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018(hereinafter referred as “**SEBI ICDR**”);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

MONIKA KOHLI & ASSOCIATES
C O M P A N Y S E C R E T A R I E S



- (d) Securities and Exchange Board of India(Buyback of Securities) Regulations, 2018 (**Not applicable to the listed entity during the Audit Period**)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**Not applicable to the listed entity during the Audit Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (**Not applicable to the listed entity during the Audit Period**)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended till date; and
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable;

and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder except for one regulation details of which are provided in **Annexure A**.
- (b) The listed entity has taken the actions to comply with the observations made in previous reports except as provided in **Annexure B**.
- (c) We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

S.No.	Particulars	Compliance Status (Yes / No/ NA)	Observations/ Remarks by PCS
1.	<u>Secretarial Standard</u> The compliances of listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	YES	None
2.	<u>Adoption and timely updation of the Policies:</u>		



	<ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity 	YES	None
	<ul style="list-style-type: none"> All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/guidelines issued by SEBI 	YES	None
3.	Maintenance and disclosures on Website:		
	<ul style="list-style-type: none"> The Listed entity is maintaining a functional website 	YES	None
	<ul style="list-style-type: none"> Timely dissemination of the documents/ information under a separate section on the website 	YES	None
	<ul style="list-style-type: none"> Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website 	YES	None
4.	Disqualification of Director None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013	YES	None
5.	To examine details related to Subsidiaries of listed entities		
	<ul style="list-style-type: none"> Identification of material subsidiary companies 	NA	The Company has no subsidiary Company
	<ul style="list-style-type: none"> Requirement with respect to disclosure of material as well as other subsidiaries 	NA	The Company has no subsidiary Company
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.	YES	None
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 as	YES	None



	prescribed in SEBI Regulations		
8.	Related Party Transactions:		
	<ul style="list-style-type: none"> The Listed entity has obtained prior approval of Audit Committee for all Related party transaction 	YES	None
	<ul style="list-style-type: none"> In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transaction were subsequently approved/ ratified/ rejected by the Audit Committee 	NA	All Related party transactions were entered after obtaining prior approval of the audit committee.
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 within the time limits prescribed thereunder	YES	None
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	None
11.	Actions taken by SEBI or Stock Exchange(s), if any No Actions 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	Yes	None
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There was no case of Resignation of Statutory Auditors



13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	None
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(d) We hereby confirm that the company has not issued any Employees Benefit Scheme and therefore the disclosure as required under regulation 46(2) (za) of the SEBI LODR read with SEBI circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31st December, 2024 is not applicable on the company.

ASSUMPTIONS & LIMITATION OF SCOPE AND REVIEW:

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 LODR Regulations and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For **MONIKA KOHLI & ASSOCIATES**
COMPANY SECRETARIES

Date : 28.05.2025
Place : New Delhi
UDIN : F005480G000478205



(MONIKA KOHLI)
B. Com (H), FCS, LL.B. I.P.
PROP.
FCS 5480, C P 4936
Peer Review No. 1348/2021

Annexure A

S. No.	<u>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</u>	<u>Regulation/ Circular No.</u>	Deviations	<u>Action Taken by</u>	<u>Type of Action i.e Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc.</u>	<u>Details of Violation</u>	<u>Fine Amount</u>	<u>Observations/ Remarks of the Practicing Company Secretary</u>	<u>Management Response</u>	<u>Remarks</u>
1	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	31(2)	The promoter's holding of equity shares in the company is not completely in demat form as required under Regulation 31 (2) of SEBI (Listing and Obligations and Disclosure Requirements) 2015 (LODR).	Nil	Nil	The equity shareholding of the promoters' group in dematerialisation form is 98.51% as on March 31, 2025	Nil	The equity shareholding of the promoters and promoters' group in dematerialisation form is 98.51% as on March 31, 2025	The Company and its RTA has asked the shareholders to get their shares into demat form.	NIL



Annexure B

S. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/ deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	31.03.2024	The listed entity shall ensure that hundred percent of the promoters and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	The equity shareholding of the promoters and promoters' group in dematerialisation form is to 98.51% as on March 31, 2025 from 96.87% as on March 31, 2024. The Registrar & Share Transfer Agent of the Company and the Company is continuously following up with the remaining promoter(s) and promoter group for getting their shares dematerialised.	The equity shareholding of the promoters and promoters' group is not in 100% dematerialised form as on March 31, 2025 , the said non-Compliance of Regulation 31 of SEBI LODR has not yet been completely rectified and is continuing as on 31.03.2025.	

