



# Samrat Pharmachem Limited

Manufacturers & Exporters of Pharmaceutical Chemicals

**Regd. Office & Factory**

Plot No. A2/3444-3445, GIDC,  
Phase 4, Ankleshwar - 393002,  
Gujarat, India.  
Phone: +91-7045456789 / 7046456789  
Web: www.samratpharmachem.com

CIN: L24230GJ1992PLCO17820

**Corporate Office**

701/702, Business Square,  
M. A. Road, Andheri (West),  
Mumbai - 400 058, India.  
Phone: +91-7507534567 / 8760345678  
E: contact@samratpharmachem.in

May 30, 2025

To,  
Department of Corporate Services,  
BSE Limited  
25th Floor, P J Towers,  
Dalal Street,  
Mumbai - 400 001.

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the financial year 2024-25**

Pursuance to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report for FY 2024-25 issued by Practising Company Secretary Mr. Aqueel A. Mulla of M/s A. A. Mulla & Associates.

Thanking you,

Yours faithfully,  
**For Samrat Pharmachem Limited**

**Nishant Kankaria**  
Company Secretary & Compliance Officer

A.A. MULLA & ASSOCIATES  
COMPANY SECRETARIES

102, SHAHJANAND CHS LTD, PLOT NO. 232 SECTOR 21 NERUL EAST NAVI MUMBAI-400 706  
EMAIL: aqueelmulla@gmail.com, Mobile: 9892237418

CS DR. AQUEEL A MULLA  
B.COM, LL.M, FCS, ACG(U.K.) DIT, Ph.D.

**SECRETARIAL COMPLIANCE REPORT OF SAMRAT PHARMACHEM LIMITED (L24230GJ1992PLC017820) FOR THE  
FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2025**

To,  
The Members  
SAMRAT PHARMACHEM LIMITED  
Plot No. A2/3445, GIDC Phase 4  
Ankleshwar-393002 Gujarat  
CIN: L24230GJ1992PLC017820

I/We have examined:

- (a) all the documents and records made available to us and explanation provided by SAMRAT PHARMACHEM LIMITED CIN: L24230GJ1992PLC017820 (“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 Report.

for the financial year ended 31<sup>st</sup> March, 2025 in respect of compliance with the provision 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 SEBI;

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

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (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;

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(f) Securities and Exchange Board of India (Issue and Listing of Nonconvertible Securities) Regulations, 2021

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

(h) Other regulations as applicable. and circulars/ guidelines issued thereunder;

and based on the above examination, I/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 in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action - Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1	SEBI LODR <i>Voting results to be submitted to Stock Exchange within two working days of conclusion of general meeting</i>	SEBI LODR 44(3)	Delay submission of Voting Results	BSE Limited	fine	Voting result not filed on prescribed time	10000 Plus GST	Fine Paid	Fine Paid	None

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

Sr. 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.	Delay of 29 days for nil encumbrance u/r 31(4) of SEBI (SAST) Regulations, 2011	31-03-2023	SEBI SAST Reg. 31(4)	Late submission of Nil encumbrance u/r 31(4) as per email from BSE Limited dated May 10, 2023	Since the encumbrance was nil as on 31st March, 2023, the promoters did not give any declaration. However, on receipt of clarification from BSE, the promoters provided the declaration as sought u/r 31(4) of SEBI (SAST) Regulations, 2011	The Promoters of the Company provided the declaration and clarification to the exchange - BSE Limited as required u/r 31(4) on May 10, 2023
2.	On close scrutiny, the PDF document of financial results for the year ended March 2023 filed with the exchange - BSE Limited on the online portal bear the digital signature of Mr. Rajesh Mehta (Executive Director) of the company.	31-03-2023	SEBI (LODR) Regulations, 2015 Reg. 33(2)(b)	Financial Results for the year ended March 2023 not signed by the authorized signatory as per email from BSE Limited dated June 7, 2023	The Financial Results for the year ended March 2023 was digitally signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the digital signature of Executive Director of the Company on June 15, 2023
3.	Bodies corporate wrongly shown in Non Institutions (Any Others), instead of respective category in the shareholding pattern for the quarter ended June 30, 2023	30-06-2023	SEBI (LODR) Regulations, 2015 Reg. 31(b)	Bodies corporate wrongly shown in Non Institutions (Any Others) in the shareholding pattern for the quarter ended June 30, 2023 as per email from BSE dated July 28, 2023	The company rectified the classification of Bodies Corporate & LLP in the shareholding pattern for the quarter ended June 30, 2023 and uploaded the revised shareholding pattern in XBRL through BSE Listing Portal on July 29, 2023	Revised Shareholding Pattern was uploaded on the BSE Listing Portal
4.	On close scrutiny, the PDF document of financial results for the quarter ended June 2023 filed with the exchange - BSE Limited on the online portal bear the physical signature of Mr. Rajesh Mehta (Executive Director) of the company.	30-06-2023	SEBI (LODR) Regulations, 2015 Reg. 33(2)(b)	Financial Results for the quarter ended June 2023 not signed by the authorized signatory as per email from BSE Limited dated August 31, 2023	The Financial Results for the quarter ended June 2023 was physically signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the physical signature of Executive Director of the Company on September 1, 2023
5.	On close scrutiny, the PDF document of financial results for the quarter ended September 2023 filed with the exchange - BSE Limited on the online portal bear the	30-09-2023	SEBI (LODR) Regulations, 2015 Reg. 33(2)(b)	Financial Results for the quarter ended September 2023 not signed by the authorized signatory as per email from BSE	The Financial Results for the quarter ended September 2023 was physically signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the physical signature of Executive Director of the

	physical signature of Mr. Rajesh Mehta (Executive Director) of the company.			Limited dated December 20, 2023		Company who is the whole-time director of the company and designated as (Executive Director) on December 21, 2023
6.	The category of the Chairperson who is also the MD of the company was missed out during online filing of the Corporate Governance for the quarter ended 30-September-2023	30-09-2023	SEBI (LODR) Regulations, 2015, Reg. 27(2)	The category of the Chairperson / MD of the company not mentioned on the Corporate Governance Report for the quarter ended September 2023	Due to inadvertence, the category of the Chairperson who is also the MD of the company was missed out during online filing of the Corporate Governance for the quarter ended 30-September-2023 & 31-December-2023. Details of MD were mentioned correctly on the corporate governance for the quarter ended 30-June-2023.	Informed BSE Limited on Jan 23, 2024 on the online portal

I 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	Observation s/ 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 of India (ICSI).	YES	
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>All the policies are in conformity with SEBI Regulations and have been the regulations/ circulars/guidelines issued by SEBI.</li> </ul>	YES	Some policies need to be reviewed and updated
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> <li>The listed entity is maintaining a functional website.</li> <li>Timely dissemination of the documents/ information under a separate section on the website.</li> <li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and</li> </ul>	YES	

	specific which redirects to the relevant document(s)/section of the website.		
4	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	YES	
5	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	The listed entity has no subsidiaries.
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	
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.	YES	
8	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	YES	
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 Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	
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 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 (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	No action have been initiated by SEBI against the listed entity, its promoters and Directors during the year under review.

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	No. Resignation of Statutory auditors during the period under review
13	Additional Non-compliances, if any: No additional non-compliances observed for any regulation/circular/guidance SEBI note etc. except as reported above.	NA	There is no such instances during the period under review

Observations/Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA'

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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

**Place: Mumbai**

**Date: 30 May, 2025**

**For A.A. MULLA & ASSOCIATES**  
**Company secretaries**

**FCS No. 2973 CP No. 3237**  
**UDIN: F002973G000505937**  
**PR No.2320/2022**  
**Unique Identification No. S1999MH026600**