



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, 2026

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 2025-26

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 2025-26 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 31ST MARCH, 2026**

To,
The Members
SAMRAT PHARMACHEM LIMITED
Plot No. A2/3444-3445, 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 31st March, 2026 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), Regulations 2015, - <i>Non-submission of the Annual Report within the period prescribed</i>	SEBI LODR Regulation 34	Delayed submission of Annual Report for the year ended March 2025	BSE Limited	Fine	Delayed submission of Annual Report for the year ended March 2025	2000 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.	The Company is required to submit the Voting Results in XBRL mode within 2 (two) working days of conclusion of the meeting. The company delayed submission of voting results and hence BSE Limited levied fine for late filing	31-03-2025	SEBI LODR Reg., 2015 Regulation 44(3)	Voting Results in XBRL mode for Postal Ballot - Event Dated April 6, 2024, not filed on prescribed time	The Company submitted the Voting Results in XBRL mode on April 19, 2024 and paid the fine of Rs. 10,000 plus tax.	The Company submitted the Voting Results in XBRL mode on April 19, 2024 and paid the fine.
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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"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and have been the regulations/ circulars/guidelines issued by SEBI. 	YES	Some policies need to be reviewed and updated
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The listed entity is maintaining a functional website. Timely dissemination of the documents/ information under a separate section on the website. 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	
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	YES	

	policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.		
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, 2026

For A.A. MULLA & ASSOCIATES
Company secretaries

FCS No. 2973 CP No. 3237
UDIN: F002973H000551026
PR No.2320/2022
Unique Identification No. S1999MH026600