



June 07, 2025

To,
Department of Corporate Services,
BSE Limited,
P.J. Tower, Dalal Street,
Mumbai- 400 001

BSE Scrip Code: 540027

Name of the Company: Prabhat Technologies (India) Limited

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

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 we hereby enclose Annual Secretarial Compliance Report issued by M/s. Shekhawat & Associates, Practicing Company Secretaries for the year ended March 31, 2025.

Kindly take the same on record.

Thanking you,

For Prabhat Technologies (India) Limited

Parag Malde
Chief Financial Officer

Encl. e/a

PRABHAT TECHNOLOGIES (INDIA) LIMITED

CIN: L72100MH2007PLC169551



Shekhawat & Associates

Practicing Company Secretary

Monika Shekhawat

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**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
PRABHAT TECHNOLOGIES (INDIA) LIMITED
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025**

(Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

I, Monika Shekhawat, Proprietor of M/s. Shekhawat & Associates., Company Secretaries, in whole time practice, have examined:

- All the documents and records made available to us and explanation provided by **PRABHAT TECHNOLOGIES (INDIA) LIMITED** ("the listed entity"),
- The filings/ submissions made by the Company to the Stock Exchanges, from time to time;
- Website of the Company; and
- any other Documents and filings, as may be relevant, which has been relied upon to make this certification,

For the financial year ended **31st Day of March, 2025** ("Review Period") in respect of compliance with the provisions of:

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended; [Not applicable during the Audit Period]
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, as amended.
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended. [Not applicable during the Audit Period]



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- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 [Not applicable during the Audit Period]
- g) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; [Not applicable during the Audit Period]
- h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; and [Not applicable during the Audit Period]
- i) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 [Not applicable during the Audit Period]
- j) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

We have examined the compliance of above regulations, circulars, guidelines issued thereunder as applicable during the Review Period and based on the above examination, we hereby report that during the review period:

1. (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	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1.	Regulation 6 (1) of SEBI LODR Regulations, 2015	Regulation-6 (1)	-	Nil	Nil	Non-Compliance with requirement to appoint qualified Company secretary as the Compliance Officer	Nil	The Company has not appointed any qualified company secretary as the Compliance officer.	The company is the process of finding a company secretary but due to the ongoing CIRP process suitable candidates are not turning up.	Nil
2.	Regulation 14 of SEBI (Listing Obligation and Disclosures Requirement), 2015	Every Listed Company has to make the payment of Annual Listing Fees to the	The Company has made the delay in the payment of Annual	Nil	Nil	The Company has made the delayed payment of Annual Listing Fees.	Nil	The Company has made the delayed payment of Annual Listing	The Company has made the delayed payment of Annual Listing	Nil



		Stock Exchange fees for upto April 30 of every year. 2024-25	listing fees for financial year 2024-25					Fees.	Fees.	
		The Company has made delay in the Payment of Listing Fees to Stock Exchange								
3.	Depository Participants (CDSL and NSDL)	Delay in Payment of Fees to CDSL and NSDL	Delay in Payment of Fees to CDSL and NSDL for the F.Y. 2024-25	Nil	Nil	The company had made delayed payment of fees for the financial year 2024-25	Nil	The company had made delayed payment of fees for the financial year 2024-25	The company had made delayed payment of fees.	Nil
4.	Section 149 and 150 read with the Companies (Creation and Maintenance of databank Independent Directors) Rules, 2019	Independent Directors are yet to register on Independent Directors Data Bank	Independent Director is yet to register on Independent Directors Data Bank	Nil	Nil	Independent Directors are yet to register on Independent Directors Data Bank	Nil	Independent Directors are yet to register on Independent Directors Data Bank		Nil

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

Sr No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks



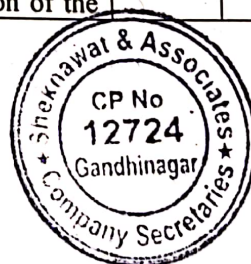
1.	Regulation 14 of SEBI (Listing Obligation and Disclosures Requirement), 2015	Every Listed Company has to make the payment of the Annual Listing Fees to the Stock Exchange upto April 30 of every year.	The Company has made delay in the Payment of Listing Fees to Stock Exchange	Nil	Nil	The Company has made the delayed payment of Annual Listing Fees.	Nil	The Company has made the delayed payment of Annual Listing Fees.	The Company has made the payment of Annual Listing Fees.	Nil
2.	Depository Participants (CDSL and NSDL)	Delay in Payment of Fees to CDSL and NSDL	Delay in Payment of Fees to CDSL and NSDL for the F.Y. 2023-24	Nil	Nil	The company had made delayed payment of fees for the financial year 2023-24	Nil	The company had made delayed payment of fees for the financial year 2023-24	The company had made the payment of fees.	Nil
3.	Section 149 and 150 read with the Companies (Creation and Maintenance of databank of Independent Directors) Rules, 2019	Independent Directors are yet to register on Independent Directors Data Bank	Independent Directors are yet to register on Independent Directors Data Bank	Nil	Nil	Independent Directors are yet to register on Independent Directors Data Bank	Nil	Independent Directors are yet to register on Independent Directors Data Bank	-	Nil

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

Sr. No.	Particulars	Compliance	Observations/ Remarks by PCS*
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		Status (Yes/ No/N A)	
1.	<p><u>Secretarial Standards:</u></p> <p>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).</p>	Yes	The Hon'ble NCLT, Mumbai bench order dated October 10, 2019, the Company is into CIRP and Mr. Rajendra K. Bhuta was appointed as the Resolution Professional of the Company further in terms of SEBI (listing obligations and disclosure Requirements) (Third amendment) Regulations, 2018 Company undergoing the Corporate insolvency resolution process is not required to comply with relevant regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with respect to Board of Directors including that of independent directors, constitution, meetings and terms of reference of the audit committee, constitution, meetings and terms of reference of the stakeholders relationship committee.
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <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 reviewed & updated on time, as per the regulations/ circulars/ guidelines issued by SEBI. 	Yes	-
3.	<p><u>Maintenance and disclosures on Website:</u></p> <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 	No	The company's website is not updated.



	website.		
4.	<u>Disqualification of Director(s):</u> 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.	<u>Details related to subsidiaries of listed entities:</u> (a). Identification of material subsidiary companies. (b). Disclosure requirement of material as well as other subsidiaries.	NA	-
6.	<u>Preservation of Documents:</u> 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.	Yes	-
7.	<u>Performance Evaluation:</u> 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.	<u>Related Party Transactions:</u> 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	There were no such transactions during the review period.
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations within the time limits prescribed	Yes	Except for the information mentioned in point no. 1 (a)



	thereunder.		
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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.	Yes	BSE issued notice on January 19, 2024 and trading in the equity shares was suspended w.e.f. January 20, 2024.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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 were no such transactions during the review period.
13.	<u>No Additional Non-compliances observed:</u> No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	There were no such transactions during the review period.

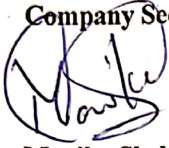


Assumptions & limitation of scope and review:

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.

For, Shekhawat & Associates

Company Secretaries



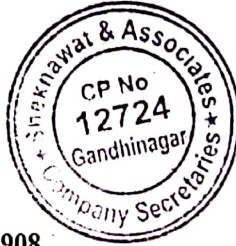
Monika Shekhawat

Proprietor

ACS: 34214, CP: 12724

UDIN: A034214G000563908

P.R. No. 5909/2024



Place: Gandhinagar

Date: 07/06/2025