



Globus Spirits Limited

(Corporate Identity Number: L74899DL1993PLC052177)

F-0, Ground Floor, The Mira Corporate Suites, Plot No. 1 & 2,
Ishwar Nagar, Mathura Road, New Delhi - 110065. **Tel.:** +011-66424400,
E-mail: corporateoffice@globusgroup.in, **Web:** www.globusspirits.com

Dated :21th May 2025

The National Stock Exchange of India Limited
Exchange Plaza, C-1, Block-G
BandraKurla Complex,
Bandra (E),
Mumbai – 400 051

The BSE Limited
PhirozeJeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400 001

Scrip Code : 533104 Name : GLOBUSSPR
Sub : Annual Secretarial Compliance Report for the Financial Year 2024-25

Dear Sir/Madam

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report dated May 20, 2025 for the Financial Year ended on March 31, 2025.

For Globus Spirits Limited,

(Santosh Kumar Pattanayak)
Company Secretary
Membership No.: A18721
Date :21th May, 2025

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ANNUAL SECRETARIAL COMPLIANCE REPORT

Globus Spirits Limited

F.Y. 2024-2025

SECRETARIAL COMPLIANCE REPORT

Globus Spirits Limited.
for the year ended on March 31, 2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Globus Spirits Limited (hereinafter referred as 'the listed entity'), having its Registered Office at F-0, Ground Floor, The Mira Corporate Suites Plot No.1&2, Ishwar Nagar, Mathura Road, New Delhi-110 065. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we, hereby, report that the listed entity has, during the review period covering the financial year ended on March 31, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- a) All the documents and records made available to us and explanation provided by Globus Spirits Limited ("the listed entity"),
- b) The filings/ submissions made by the listed entity to the stock exchanges.
- c) Website of the listed entity,
- d) Other relevant documents and filing as may be relevant, which has been relied upon to make this report for the financial year ended on 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, wherever applicable, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) 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 Non-Convertible Securities) Regulations, 2021;
- 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 and circulars/ guidelines thereunder;

And based on the above examination, I hereby report that, during the Review Period:

I.

- (a) The listed entity has complied with, wherever applicable, the provisions of the above Regulations and circulars/guidelines issued there under, 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	Management Response	Remarks
NIL										



(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 report.	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 of	Details of Violation / deviations and actions taken/ penalties 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.	Two hundred and fifty seven days elapsed between two consecutive meetings of Risk Management Committee against the prescribed one hundred and eighty days as per Reg. 21(3C) of LODR	31.03.2024	As per Regulation 21 (3C) of LODR, the meetings of the Risk Management Committee (RMC) be conducted in such a manner that not more than one hundred and eighty days shall elapse between any two consecutive meetings.	More than 180 days elapsed between two consecutive meetings of the Risk Management Committee (RMC). A warning letter was issued by the National Stock Exchange. No penalty was imposed.	As per the management of the Company, Deviation occurred due to misinterpretation of Regulation 21(3A) read with regulation 21(3C). The listed entity stated that it will be cautious henceforth.	none

(c). We hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1	<u>Secretarial Standard:</u> The compliances of the 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. 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	<u>Maintenance and disclosures on Website:</u> <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 re-directs to the relevant document(s)/ section of the website. 	Yes	None
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act,2013	Yes	None
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	None
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, 2015	Yes	None
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the	Yes	None



	Any additional non-compliance observed for all SEBI Regulation/Circular/Guidance note etc		
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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 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.

For **SKP & Co.**

Company Secretaries



(CS Sundeep K. Parashar)

M. No. : F 6136

C.P. No. : 6575

PR : 1323/2021

UDIN : F006136G000391807

Place : Vaishali

Date : 20.05.2025