

26<sup>th</sup> May, 2023

To,

The Manager,  
Department of Corporate Services  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai – 400001

**Scrip Code – 526025**

**Subject: Submission of Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2023 in compliance of Regulation 24 (A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

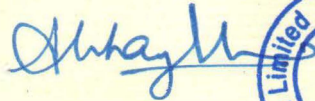
Respected Sir,

With reference to the above captioned subject, we are enclosing herewith the Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2023 issued by M/s Soniya Gupta and Associates, Company Secretaries.

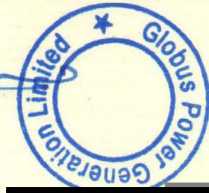
This is for your information and necessary records.

Thanking You,  
Yours faithfully,

**For Globus Power Generation Limited**



**Abhay Khanna**  
Director



*Enclosure as above*

CIN NO.: L40300RJ1985PLC047105

REGD. OFFICE : Shyam House, Plot No. 3, Amrapali Circle, Vaishali Nagar, Jaipur, Rajasthan-302021 | Ph.:0141-4025631  
CORPORATE OFFICE : A-60, Naraina Industrial Area, Phase-1, New Delhi-110028 | Ph.: 011-25895622 | Fax : 011-25792194  
E-mail : globuscdl@gmail.com | Website : www.gpgl.in



**SONIYA GUPTA & ASSOCIATES**  
**PRACTICING COMPANY SECRETARIES**

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**SECRETARIAL COMPLIANCE REPORT**  
**of**  
**GLOBUS POWER GENERATION LIMITED**  
**for the year ended on 31.03.2023**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **GLOBUS POWER GENERATION LIMITED** (Formerly Known As Globus Constructors & Developers Limited) (hereinafter referred as 'the listed entity'), having its Registered Office at Shyam House, Plot No. 3, Amrapali Circle, Vaishali Nagar, Jaipur, Rajasthan, 302021. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, 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 POWER GENERATION LIMITED ("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 certification for the year ended 31.03.2023 ("Review Period") in respect of compliance with the provisions of:
  - i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
  - ii. 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, 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; (**Not applicable to the listed entity during the review period**)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

a&Pb r ofqfbp ka Bu e kdb l ca c Hkaf r v h l c Pb r ofqfbp Obdr i ql kp) / - . 58 Not applicable to the listed entity during the review period)

b&Pb r ofqfbp ka Bu e kdb l ca c Hkaf Pe ob pba Bj mil vbb bkbcfq ka Pt b q Bnr fqy Obdr i ql kp) / - . 8 Not applicable to the listed entity during the review period)

c&Pb r ofqfbp ka Bu e kdb l ca c Hkaf fpr b ka l fpr kd c Ab q Pb r ofqfbp Obdr i ql kp) / - - 58 Not applicable to the listed entity during the review period)

d&Pb r ofqfbp ka Bu e kdb l ca c Hkaf fpr b ka l fpr kd c l k\* l ks boq ib Pb r ofqfbp Obdr i ql kp) / - . 8 Not applicable to the listed entity during the review period)

e&Pb r ofqfbp ka Bu e kdb l ca c Hkaf Ml ef fql k l c Hkfabo o afkd Obdr i ql kp) / - . 28

f& l q bo obdr i ql kp p mmif ib&

ka fo ri op dr fa bifkbp fpr ba q bobr ka bo 8

ET b e bob v obnl oq q ar ofkd q b Obs fbt Mbofl a q b l j mif k b p q p l c q b ifpba bkcfy fp mmbka ba p bil t 7

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	<p><b>Secretarial Standards:</b></p> <p>e b l j mif k bp l c q b ifpba bkcfy ob fk l ca k b t f q q b mmif ib Pb obq of i Pq ka ca p PP&amp; fpr ba v q b Hk p q q b l c l j m kv Pb obq of bp Hkaf F PF pkl qcfba v q b bkq i Dl s bok j bkqr ka bo pb ql k . 5 . - &amp; l c q b l j m kfbp q) / - . 0 ka j ka q ofiv mmif ib</p>	BP	
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>ii mmif ib nl if fbp r kabo PB E Obdr i ql kp ob al n pa t f q q b mmol s i l c l ca l ca fob d op l c q b ifpba bkcfy</li> <li>ii q b nl if fbp ob fk l kcl oj f q t f q PB E Obdr i ql kp ka e s b bbk obs fbt ba r na qba l k q j b) p nbo q b obdr i ql kp fo ri op dr fa bifkbp fpr ba v PB E</li> </ul>	BP	

<p>3.</p>	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• e b i f p p a b k q f y f p j f k q f k f k d</li> <li>• f j b i v a f p p b j f k q l k l c e b a l r j b k q p</li> <li>• T b * i f k h p m o l s f a b a f k k r i l o n l o q b d l s b o k k b o b n l c q p r k a b o O b d r i q l k / 4 / &amp; o b r o q b k a p r b f c t e f e o b * a f o b q p d e b o b i b s k q a l r j b k q p &amp; p b q l k l c e b i b p f c b</li> </ul>	<p>BP</p>	<p></p>
<p>4.</p>	<p><b>Disqualification of Director:</b></p> <p>l k b l c e b a f o b q o p &amp; l c e b l j m k v f p o b a f p n r i f c f b a k a b o P b q l k . 3 1 l c l j m k f b p q / - . 0 p l k c f o j b a v e b i f p p a b k q f y</p>	<p>BP</p>	<p></p>
<p>5.</p>	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>(a) F a b k q c f q l k l c j q o f i p r p f a f o v l j m k f b p</p> <p>(b) A f p i l p r o b o b n r f o j b k q l c j q o f i p t b i i p l c e b o p r p f a f o f b p</p>	<p>l q m m i f i b</p>	<p>l p r e p r p f a f o v b u f p p a r o f k d e b o b n l c q k d n b o f l a</p>
<p>6.</p>	<p><b>Preservation of Documents:</b></p> <p>e b i f p p a b k q f y f p m o b p b o s f k d k a j f k q f k f k d o b l o a p p n o b p o f b a r k a b o P B E O b d r i q l k p k a a f p n l p i l c o b l o a p p n b o M i f v l c M o b p b o s q l k l c A l r j b k q p k a o e f s i m l i f v n o b p o f b a r k a b o P B E I L A O O b d r i q l k p / - . 2</p>	<p>BP</p>	<p></p>
<p>7.</p>	<p><b>Performance Evaluation:</b></p> <p>e b i f p p a b k q f y e p l k a r q a n b o d o j k b b s i r q l k l c e b l o a ) f k a b n b k a b k q A f o b q o p k a q e b l j j f q p b p q e b p q o q l c b s b o v c f k k f i v b o a r o f k d e b c f k k f i v b o p n o b p o f b a f k P B E O b d r i q l k p</p>	<p>BP</p>	<p></p>
<p>8.</p>	<p><b>Related Party Transactions:</b></p> <p>&amp; e b i f p p a b k q f y e p l q f k b a n o f l o m o l s i l c r a f q l j j f q p b d o i i o b i q a m o v q p k p q l k p 8 l o</p> <p>&amp; e b i f p p a b k q f y e p m o l s f a b a a b q f i b a o b p l k p i l k d t f e p l k c f o j q l k t e b e b o q e b q p k p q l k p t b o b p r p b n r b k q v m m o l s b a , o q c f b a , o b g b q a v e b r a f q l j j f q p b f k p b k l n o f l o m o l s i e p b b k l q f k b a</p>	<p>BP</p>	<p></p>

9.	<b>Disclosure of events or information:</b> e b i f p p a b k c f y e p n o l s f a b a i i c e b o b n r f o b a a f p i l p r o b p & r k a b o O b d r i q l k 0 - i l k d t f c e P e b a r i b H F I c P B F I L A O O b d r i q l k p / - . 2 t f c f k c e b c f j b i f j f c p n o b p o f b a c e b o b r k a b o	BP	<input type="checkbox"/>
10.	<b>Prohibition of Insider Trading:</b> e b i f p p a b k c f y f p f k l j m i f k b t f c e O b d r i q l k 0 2 & 0 3 & P B F M l e f f c l k c k p f a b o o a f k d & O b d r i q l k p / - . 2	BP	e b l j m k v f p j f k q f k f k d c e b P q r q o b a A f d f q i A q p b P A A & f k e l r p b
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> l q l k p & e p b b k q h b k d f k p c e b i f p p a b k c f y f c p n o l j l q b o p a f o b q o p p r p f a f o f b p b f c e b o v P B F l o v P q h B u e k d b p f k i r a f k d r k a b o c e b P q k a c a L n b o q f k d M l b a r o b p f p r b a v P B F c e d r d e s o f l r p f o r i o p & r k a b o P B F O b d r i q l k p k a f o r i o p d r f a b i f k b p f p r b a c e b o b r k a b o b u b n q p n o l s f a b a r k a b o p b m o q b m o d o m e e b o b f k &	BP	<input type="checkbox"/>
12.	<b>Additional Non-compliances, if any:</b> l a a f c l k i k l k * l j m i f k b l p b o s b a c l o k v P B F o b d r i q l k, f o r i q, d r f a k b k l q b q	BP	<input type="checkbox"/>

l j m i f k b p o b i c h a q o b p f d k q l k c p q c q o v r a f d o p c o l j i f p p a b k c f y b p k a c e b f o j q o f i p r p f a f o f b p p r b o P B F f o r i o I O, C A, A., . . 1, / - . 6 a c h a 5 c e L q b o / - . 6 7

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	Compliances with the following conditions while appointing/re-appointing an auditor		

<input type="checkbox"/>	<p>i. Fē qē b r a f d o ē p obpfdkba t fē fl k l 2 a v p col j qē b bka l c nr o p o l c c f k k f i v b o) qē b r a f d o bcl ob pr e obpfdk q l k) e p f p r ba qē b ifj f q a o b s f b t , r a f q o b n l o q d o p r e nr o p o 8 l o</p> <p>ii. Fē qē b r a f d o ē p obpfdkba q p o l 2 a v p o l j qē b bka l c nr o p o l c c f k k f i v b o) qē b r a f d o bcl ob pr e obpfdk q l k) e p f p r ba qē b ifj f q a o b s f b t , r a f q o b n l o q d o p r e nr o p o p t b i i p qē b k b u q n r o p o 8 l o</p> <p>iii. Fē qē b r a f d o ē p p f d k b a qē b ifj f q a o b s f b t , r a f q o b n l o q d o qē b c f o p qē o b b n r o p o p l c c f k k f i v b o) qē b r a f d o bcl ob pr e obpfdk q l k) e p f p r ba qē b ifj f q a o b s f b t , r a f q o b n l o q d o qē b i p p n r o p o l c p r e c f k k f i v b o p t b i i p qē b r a f q o b n l o q d o p r e c f k k f i v b o</p>	l q m m i f i b	e b o b t p k l e k d b f k p q q d o v r a f d o
<b>2.</b>	<b>Other conditions relating to resignation of statutory auditor</b>		
<input type="checkbox"/>	f O b n l o q k d l c l k b o k p v r a f d o t f q o b p n b q d qē b i f p a b k q q y, f q j q o f i p r p f a f o v q qē b r a f d o l j j f q b b 7	l q m m i f i b	e b o b t p k l e k d b f k p q q d o v r a f d o

	<p>a. Hk pbl c kv l k bok t fep ebj k dbj bkq l c eb ifpba bkqy, j qof i pr pfafov pr e p kl k* s fi fifv l c fkl oj qf k kl k* l l nbo qf k v eb j k dbj bkq t ef e e pe j nboba eb rafq mol bpp eb rafq o e p nmol eba eb e foj k l c eb rafq l j j fqb b l c eb ifpba bkqy ka eb rafq l j j fqb b pe ii ob b s b pr e l k bok afob qv ka fj j baf qv t fep r q pnb fef iiv t f fkd c eb nr apov rafq l j j fqb b j bbfkdp</p> <p>b. Hk p eb rafq o mol ni p b p d obpfdk) ii l k bok p t fep obpnb q d eb mol ni pba obpfdk qf k) il kd t fep obibs k q al r j bkq e p bbk ol r de q d eb kl qf b l c eb rafq l j j fqb b Hk p b p t e bob eb mol ni pba obpfdk qf k f p ar b d kl k* ob bfinu l c fkl oj qf k, buni k qf k col j eb l j m kv) eb rafq o e p fkl oj ba eb rafq l j j fqb b eb abq fip l c fkl oj qf k, buni k qf k pl r de q ka kl q mol s faba v eb j k dbj bkq) p mif ib</p> <p>c. eb rafq l j j fqb b, l ca c Afob d op) p eb pb j v b) a bif bo qba l k eb j qbo l k ob bfinu l c pr e fkl oj qf k col j eb rafq o obi qfkd d eb mol ni p i d obpfdk p j bkqf kba l s b ka l j j r kf q f q s fbt p d eb j k dbj bkq ka eb rafq o</p> <p>ff Afp i fj bofk pbl c kl k* ob bfinu l c fkl oj qf k</p> <p>eb rafq o e p mol s faba k mol nof q a f p i fj bofk fep rafq obni o) t ef e f p f k l ca k b t fep eb Pq ka cap l c rafqkd p pnb fcfba v ( F E, CO ) f k p b t e bob eb ifpba bkqy, fep j qof i pr pfafov e p kl q mol s faba fkl oj qf k p bnr foba v eb rafq o</p>		
3.	<p>eb ifpba bkqy, fep j qof i pr pfafov e p l q f kba fkl oj qf k col j eb rafq o r ml k obpfdk qf k) f k eb cl oj q p pnb fcfba f k k kbur ob* f k PB E fo ri o FO, CA, A., . . 1, / - . 6 a qba . 5 ep L d bo) / - . 6</p>	l q mif ib	e bob t pkl e kdbfk p q q d ov rafq op

(a) eb ifpba bkqy e p l j mifba t fep eb mol s fpl kp l c eb l s b Obdr i qf kp ka fo ri op dr fa bifk b p fpr ba eb bobr ka bo) bu bnu f k obpnb q l c j qpop pnb fcfba bil t 7 Not Applicable

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	Management Response	Remarks
	1. Compliance with									

(b) Not Applicable

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	Management Response	Remarks
	1. Compliance with									

**Assumptions & Limitation of scope and Review:**

- 1. The review is based on the information provided to the auditor and does not constitute a guarantee or assurance.
- 2. The review is limited to the period specified in the engagement letter and does not extend to periods before or after that period.
- 3. The review is conducted on the basis of the documents and records provided to the auditor and does not include a physical verification of assets.
- 4. The review is conducted on the basis of the information provided to the auditor and does not include a physical verification of assets.

