

May 29, 2025

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400001

**Scrip Code:** 500135

**National Stock Exchange of India Limited**

Exchange Plaza, C/1, Block G,  
Bandra-Kurla Complex, Bandra (E), Mumbai - 400051

**Trading Symbol:** EPL

**Sub. : Annual Secretarial Compliance Report for the financial year ended March 31, 2025  
- EPL Limited ("Company")**

**Ref. : 1. Regulations 24A of the Securities and Exchange Board of India (Listing  
Obligations and Disclosure Requirements) Regulations, 2015 (as amended)  
("SEBI LODR Regulations")  
2. ISIN: INE255A01020**

Sir/ Madam,

In terms of the above referred provisions of SEBI LODR Regulations, the Company has obtained the Secretarial Compliance Report for the financial year ended March 31, 2025 from M/s. Dilip Bharadiya & Associates, Company Secretaries and a copy of the same is enclosed herewith, for your reference.

This is for your information and records.

Thanking you.

Yours faithfully,  
For **EPL Limited**

**Onkar Ghangurde**

**Head - Legal, Company Secretary & Compliance Officer**

Encl.: As above

**Registered Office**

P.O. Vasind, Taluka Shahpur, Dist. Thane 421604, Maharashtra

Tel: +91 9673333971/9882

CIN: L74950MH1982PLC028947

complianceofficer@epglobal.com

**EPL LIMITED**

(Formerly known as Essel Propack Limited)

**Corporate Office:** Top Floor, Times Tower, Kamala City, Senapati Bapat Marg, Lower Parel

Mumbai 400013, India

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**Dilip Bharadiya**

B.Com., A.C.A., F.C.S.

**Shivangini Gohel**

B.Com., LLB, PGDSSL, A.C.S.

**Aayushi Lahoti**

B.Com., LLB, A.C.S.

**DILIP BHARADIYA & ASSOCIATES**

**COMPANY SECRETARIES**

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**SECRETARIAL COMPLIANCE REPORT**

**OF EPL LIMITED FOR THE YEAR ENDED MARCH 31, 2025**

**[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended)]**

To,  
The Board of Directors,  
**EPL LIMITED**  
P.O. Vasind Taluka Shahapur,  
Thane- 421604, Maharashtra

We, Dilip Bharadiya & Associates, Practicing Company Secretaries, have conducted the review of the secretarial compliance at **EPL Limited** (hereinafter referred as "Company"/ "listed entity"), having its Registered Office at P.O. Vasind Taluka Shahapur, Thane- 421604, Maharashtra, in terms of the provisions of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended), for the financial year ended on March 31, 2025.

The review was conducted in a manner that provided us a reasonable basis for evaluating secretarial compliances and to provide our observations thereon for the financial year ended March 31, 2025.

During the conduct of our review, we have examined:

- a) all the documents and records made available to us and explanation provided by/ on behalf of 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 **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 (each, as amended) have been examined, include:

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations");
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - to the extent applicable;
- 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 - Not applicable during the period under review;
- 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 – to the extent applicable;
- 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 - to the extent applicable;
- i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulation, 1993,

and based on the above examination, 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	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
Not Applicable										

- 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 March 31, 2024	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
Not Applicable						



Further, we hereby report the compliance status of the listed entity, for the review period, as below:

Sr. No.	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS
1	<b>Secretarial Standards:</b> 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	NA
2	<b>Adoption and timely updation of the Policies:</b> <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 entity.</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; timely updated as per the regulations/ circulars/ guidelines issued by SEBI.</li> </ul>	Yes  Yes	NA
3	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>• The listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents/ information under separate section on the website.</li> <li>• 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.</li> </ul>	Yes  Yes  Yes	NA
4	<b>Disqualification of Director(s):</b> None of the Director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013.	Yes	NA
5	<b>Details related to subsidiaries of listed entity:</b> <ul style="list-style-type: none"> <li>a). Identification of material subsidiary companies.</li> <li>b). Requirements with respect to disclosure of material as well as other subsidiaries.</li> </ul>	Yes  Yes	Complied
6	<b>Preservation of Documents:</b> 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	NA



Sr. No.	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS
7	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in applicable SEBI Regulations.	Yes	NA
8	<b>Related Party Transactions:</b> 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 Yes	The listed entity has obtained prior approval / ratification for all Related Party Transactions from the Audit Committee.
9	<b>Disclosure of events or information:</b> 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 thereunder.	Yes	NA
10	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.	Yes	NA
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No actions 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	No non-compliances were observed except as mentioned in the Note below.



Sr. No.	Particulars	Compliance Status (Yes/ No/ NA)	Observations/ Remarks by PCS
12	<p><b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> 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.</p>	NA	During the year under review, there was no resignation of Statutory Auditors from the listed entity or its material subsidiary. Hence, disclosure related to resignation of statutory auditor from listed entity and its material subsidiary as per SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 is not applicable.
13	<p><b>No additional non-compliances observed:</b> No additional non-compliances observed for any of the SEBI regulation/circular/guidance SEBI note etc. except as reported above.</p>	Yes	NA

**Note:**

The National Stock Exchange of India Limited ("NSE") had, vide its letter dated March 28, 2025, issued a notice to the listed entity, for Non-submission of certificate regarding fulfilment of payment obligations towards the Commercial Papers issued by the listed entity, as required in terms of the applicable Circular issued by the SEBI in that regard, and had imposed a fine in relation to the same. The listed entity thereafter, duly submitted the certificate regarding fulfilment of payment obligations towards the Commercial Papers with the NSE, on March 28, 2025 and submitted a request with the NSE to waive the fine imposed, inter alia in view of it being an inadvertent delay in submission and also in view of the fact that the interests of the Investors were not harmed in any manner, as the listed entity had duly complied with its actual payment obligations towards the Commercial Papers on time, without any delay. The listed entity also made suitable representations with the NSE and as on the date of this report, the listed entity awaits the response from NSE on its request.

**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 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: May 29, 2025

For **DILIP BHARADIYA & ASSOCIATES**



A handwritten signature in blue ink, appearing to read "Dilip Bharadiya".

**DILIP BHARADIYA**

Partner

FCS No.: 7956., C P No.:6740

UDIN: F007956G000495322

PEER REVIEW NUMBER: 5825/2024