

**SECRETARIAL COMPLIANCE REPORT OF
SUPER CROP SAFE LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2025**

I, Jitendra Pravinbhai Leeya, Company Secretaries in Practice having office at K-303, Karnavati Enclave, Opp. Shrinand City – 3, New Maninagar, Ramol, Ahmedabad – 382449 have examined:

- (a) all the documents and records made available to me and explanation provided by **SUPER CROP SAFE LIMITED** having its Registered Office at C 1 / 290, GIDC Estate, Naroda, Phase I, Ahmedabad - 382330, Gujarat, India (“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 year ended **31st March, 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 whichever were applicable to the company during the year, 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 (**No events during the year**);
- (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 (**No events during the year**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**No events during the year**);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (**No events during the year**);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (i) other regulations as applicable

and circulars/ guidelines issued thereunder; However, it has been observed that there were no events requiring compliance under the regulations covered under para (b), (d), (e), & (f) mentioned hereinabove.



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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 (Regulation/ 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.	Non-submission of the financial results within the period.	Reg. 33	Late Submission of FR	BSE limited vide email dated 15/07/2024	Fine	Non-submission of the financial results within the period	106200	Statement of Assets and Liability and Cash flow statement was not submitted to exchange on time	Company will take proper care of timely compliance	NA
2.	Non-compliance with submission of secretarial compliance report	Reg. 24A	Late Submission of ASCR	BSE limited vide email dated 15/07/2024	Fine	Non-compliance with submission of secretarial compliance report	35400	Annual secretarial compliance report was not submitted to exchange on time	Company will take proper care of timely compliance	NA
3.	Website	Reg. 46	Updated Website not available	No action taken	NA	Website needs to be updated	NA	Functional website is available but many data required to be updated.	Company is in process to update the website	NA

(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	There was late payment of listing fees by the Company resulting into violation of SEBI LODR.	31/03/2024	Fees to Exchange	Annual fees not paid within due date	Company assured to do timely compliance in future	Company assured to do timely compliance in future



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2	BSE Sent email dated 03/10/2023, stating various past Non-compliances done by Company and Outstanding fine amount was demanded from the company for all this 4 (Four) Non-compliances made by the company in past years.	31/03/2024	Related Party Transaction Reg 23 (9) for Quarter ended on March-22 Corporate Governance report Reg 27 (2) for Quarter ended on June 15 Financial statement Reg 33 for Quarter ended on March 16 Intimation of Board Meeting Reg 29 (2) 29(3) Quarter ended on Nov-20	BSE Sent email dated 03/10/2023, stating various past Non-compliances done by Company and Outstanding fine amount was demanded from the company for all this 4 (Four) Non-compliances made by the company in past years. 75000+ GST 1000+ GST 10000+GST 10000+GST	Company assured to do timely compliance in future	Company assured to do timely compliance in future
3	Company had filed Waiver Application as the company was properly compliant and no such non-compliance was there.	31/03/2024	constitution of audit committee' Reg. 18(1)	constitution of audit committee' 139240	Company assured to do timely compliance in future	Company assured to do timely compliance in future
4	Company had filed Waiver Application as the company was properly compliant and no such non-compliance was there.	31/03/2024	constitution of nomination and remuneration committee Reg. 19(1)/19(2)	constitution of nomination and remuneration committee 139240	Company assured to do timely compliance in future	Company assured to do timely compliance in future
5	Statement of Assets and Liability and Cash flow statement was not attached in pdf file but full result was submitted in XBRL, Company had filed waiver application to exchange, however reply is awaited from exchange.	31/03/2024	Non-submission of the financial results within the period	Non-submission of the financial results within the period 112100	Company assured to do timely compliance in future	Company assured to do timely compliance in future
6	Company failed to submit Share holding pattern in time due to late receipt of BENPOS The company is cautioned and advised to make payment of dues of RTA in time to avoid such failure.	31/03/2023	Late submission of shareholding pattern	Late submission of shareholding pattern 2360	Company assured to do timely compliance in future	Company assured to do timely compliance in future



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I. 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)	Observations/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 reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI. 	Yes No	Review and Updation is under process
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 No No	As informed by the management, website updation is under process.
4.	Disqualification of Director: 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	Yes Yes	The listed entity does not have any material subsidiary.
6.	Preservation of Documents: 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	
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; or (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 NA	(a) - (b) Please refer point 8(a)



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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, 2015 within the time limits prescribed thereunder.	Yes	
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	No	Software available, but PCS certificate is yet to be submitted to exchange
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	NA	Details of fine imposed/ levied by BSE for non-compliance is separately mentioned as above.
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	
13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/ circular/guidance note etc. except as reported above.	NA	

We further, report that the listed entity is in compliance/ ~~not in compliance~~ with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46 (2) (za) of the LODR Regulations. – **NOT APPLICABLE**

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.



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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.

Place: Ahmedabad

Date: 29/05/2025

Signature:

J Leeya



JITENDRA LEEYA
Practicing Company Secretary
ACS/FCS No.: A31232
C P No.: 14503
P R No.: 2089/2022
UDIN: A031232G000486161