SUPRA TRENDS LIMITED

Date: May 29, 2025

To
The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001.

Dear Sir / Madam,

Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A of the SEBI (LODR)Regulations, 2015
Ref: Scrip Code: 511539

Please find enclosed herewith the Secretarial Compliance Report for the Financial Year ended March 31, 2025 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Kindly take the above information on your record.

Thanking you,

Yours Sincerely,

For **Supra Trends Limited**

Mathamsetty Venkata Krishna Sunil Kumar

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Date: 2025.05.29 20:22:27 +05'30'

M.V.K Sunil Kumar
Managing Director
DIN: 03597178

Secretarial Compliance Report of Supra Trends Limited

For the Financial Year ended March 31, 2025

To,
The Board of Directors,
Supra Trends Limited
Office No.6, Plot 20, HUDA Techno Enclave,
Hitec City, Madhapur, Hyderabad,
Telangana, India, 500081.

I. I, N Vanitha, Practicing Company Secretary, have examined:

(a) all the documents and records made available to me and explanations provided by **Supra Trends Limited (the 'Company')** having its Registered Office at Office No.6, Plot 20, HUDA Techno Enclave, HITEC City, Madhapur, Hyderabad, Telangana, India, 500081 (hereinafter referred to as **"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 31.03.2025 ("01.04.2024 to 31.03.2025") 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 any amendment issued thereto; 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");

(c) The Depositories Act, 1996:

II. The Specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the review period)**.

- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat

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Equity) Regulations, 2021; (**Not applicable to the Company during the review period).**

- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period).**

- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

- The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder;

- Circulars, Master Circulars/ guidelines issued there under.

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
1.	As per 31A (8)(a) of SEBI (LODR) Regulations 2015, The events shall be deemed to be material events and shall be disclosed by the listed entity to the stock exchanges as soon as reasonably possible and not later than twenty-four hours from the occurrence of the event i.e. receipt of request for re-classification by the listed entity from the promoter(s) seeking re-classification.	Regulation 31A (8)(a) of SEBI (LODR) Regulations 2015	Regulation 31A (8)(a) of SEBI (LODR) Regulations 2015, the Company has to submit the request for reclassification received from the promoter(s) seeking re-classification within 24 hours to the stock exchange. The	Stock Exchange (BSE Limited)	Advisory	The company has to submit the request for reclassification received from the promoter(s) seeking re-classification within 24 hours from date of receipt of application i.e. August 28, 2023. The Company had submitted disclosure regarding the same on December 22, 2023 which is beyond 24 hours.	Nil	As per Regulation 31A (8)(a) of SEBI (LODR) Regulations 2015, the listed entity has to submit the request for reclassification received from the promoter(s) seeking re-classification within 24 hours to the stock exchange. The Company had received application seeking re-classification from the promoter(s) on	The BSE Limited issued advisory letter on August 07, 2024. The Company is advised to ensure compliance of requirements of SEBI (LODR) Regulations, 2015 In addition to above Company is advised to disseminate this advisory letter to the stock	NA

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			Company had received application seeking re-classification from the promoter(s) on August 28, 2023. However, The Company has filed the disclosure regarding the same on December 22, 2023.						August 28, 2023. However, The Company has filed the disclosure regarding the same on December 22, 2023 which is beyond 24 hours.	exchange, hence Company disseminated the same on August 07, 2024	
2.	As per 31A (8)(c) of SEBI (LODR) Regulations 2015, The events shall deemed to be material events and shall be disclosed by the listed entity to the stock exchanges as soon as reasonably possible and not later than twenty-four hours from submission of application for seeking no-objection or approval of the recognized stock exchanges for re-classification of status as public by the listed entity to the stock exchanges.	Regulation 31A (8)(c) of SEBI (LODR) Regulations, 2015	Regulation 31A (8)(c) of SEBI (LODR) Regulations, 2015, the company has to disclose the submission of application for seeking no-objection or approval of the recognized stock exchanges for re-classification of status as public by the listed entity to the stock exchanges within 24 hours to the stock exchange. The Company had submitted the application with the Exchange on October	Stock Exchange (BSE Limited)	Advisory	The company has to disclose the submission of application for seeking no-objection or approval of the recognized stock exchanges for re-classification of status as public by the listed entity to the stock exchanges within 24 hours from date of submission of application i.e. October 28, 2023. The Company has submitted disclosure regarding the same on July 11, 2024 which is beyond 24 hours.	Nil	As per Regulation 31A (8)(c) of SEBI (LODR) Regulations 2015, the company has to disclose the submission of application for seeking no-objection or approval of the recognized stock exchanges for re-classification of status as public by the listed entity to the stock exchanges within 24 hours. Company submitted the application with the Exchange on October 28, 2023. However, disclosure regarding the same has been submitted on July 11, 2024 which is beyond 24 hours.	The BSE Limited issued advisory letter on August 07, 2024. The Company is advised to ensure compliance of requirements of SEBI (LODR) Regulations, 2015 In addition to above, the Company is advised to disseminate this advisory letter to the stock exchange, hence Company disseminated the same on August 07,2024	NA

			28, 2023. However, disclosure regarding the same has been filed on July 11, 2024.							

(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	Observations made in the secretarial compliance report made in the year ended 31st March, 2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/ deviations and action 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.	NA	NA	NA	NA	NA	NA

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

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	**<u>Secretarial Standards:</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>** • 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 have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes	None
3.	**<u>Maintenance and disclosures on Website:</u>** • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under aseparate 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

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E-Mail: csvanitha19@gmail.com

4.	**Disqualification of Directors:** None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013.	Yes	None
5.	**Details related to Subsidiaries of listed entities:** (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	None
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 LODR Regulations, 2015.	Yes	None
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 as prescribed in SEBI Regulations.	Yes	None
8.	**Related Party Transactions:** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.	N.A (The listed entity does not have any Related party transactions)	None
	b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation wheth0er the transactions were subsequently approved/ratified/rejected by the Audit Committee.	N.A	Refer point 8(a) above
9.	**Disclosure of events or information:** 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	None
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6)of SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by	Yes	N.A

	Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.		
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** 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.	N.A (Refer Note below)	N.A
13.	**No additional non-compliances observed:** No additional non-compliance observed for any of the SEBI Regulation/circular/guidance note etc.,	Yes	None

Note: The listed entity is in compliance with the conditions specified under paragraph 6.1 and 6.2 of Section V-D of chapter V of SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023. The terms of appointment of the Statutory Auditors have been modified in line with the said circular. Further, there were no instances of any resignation of Statutory Auditors during the period under review.

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. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

Place: Hyderabad
Date: 29.05.2025

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Practicing Company Secretory
ACS No.:26859
C.P. No.:10573
Peer Review Cert No.: 1890/2022
UDIN: A026859G000497373