MULTIPLUS HOLDINGS LIMITED

B-101, Bhaveshwar Plaza, L. B. S. Marg, Ghatkopar (W), Mumbai - 400086. • Tel.: 022-2500 5046

Date: 30th May, 2025

To,
Department of Corporate Services
BSE Limited,
P J Towers, Dalal Street,
Mumbai - 400 001

Security Code: 505594

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2024-25

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2025.

You are requested to take the same on your record.

Thanking You,

Yours Faithfully
For MULTIPLUS HOLDINGS LIMITED

JIGNESH RAMNIKLAL SHETH

Digitally signed by JIGNESH RAMNIKLAL SHETH
DN: c=IN, o=Personal, title=9336, pseudonym=7D39E8A68E9D47802DBAFEFA2210E397, 2.5.4.20=33e79dfefd24d551dd9e53f560755333a803ba6287a2ce81a4e3a71834e31bed, postalCode=400077, st=Maharashtra, serialNumber=9D1CE8C85DF43614130FC80E47B9D4BB1669CF7D31D0C214B08757D7B7DDC124, cn=JIGNESH RAMNIKLAL SHETH
Date: 2025.05.30 16:17:58 +05'30'

JIGNESH SHETH
Managing Director
DIN: 00290211

Encl. As above

M. K. CHOKSHI & ASSOCIATES
Practicing Company Secretaries
C/8, C/13, Hira Anand Tower, Gordhanwadi Cross Road,
Kankaria BRTS Road, Ahmedabad-380 028.
Mob. +91 7878735447 | E-mail: cs.mkchokshi@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT
2024-25

Secretarial compliance report of MULTIPLUS HOLDINGS LIMITED for the financial year ended 31st March 2025

I, MANSI KAIVAL CHOKSHI, proprietor of M K Chokshi & Associates, Practicing Company Secretaries in Practice having office at "C/8 & C/13, Hira-anand Tower, Gordhanwadi Cross Road, Kankaria, Ahmedabad-380028" have examined:

(a) all the documents and records made available to me and explanation provided by **MULTIPLUS HOLDINGS LIMITED (CIN:** L65990MH1982PLC026425**)** ("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 on **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, 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; *(there were no events requiring compliance during the Review Period)*

c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *(there were no events requiring compliance during the Review Period)*

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

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

g) Securities and Exchange Board of India (Transfer Agents) Regulations, 1993; *(there were no events requiring compliance during the Review Period)*

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h) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; *(there were no events requiring compliance during the Review Period)*

i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; *(there were no events requiring compliance during the Review Period)*

j) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(there were no events requiring compliance during the Review Period)*

k) Securities and Exchange Board of India (Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2021; *(there were no events requiring compliance during the Review Period)*

l) and circulars/ guidelines/Amendments issued thereunder;

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

I 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	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Sample check is gone through.
2	**Adoption and timely updation of the Policies:** • 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	-
3	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a f • unctional website	Yes	Company has functional website but company has not complied with

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
	• 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		Regulation 46 (2) of SEBI Listing Regulation.
4	**Disqualification of Director:** None of the Director(s) of the Company 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	NA	Company do not have any material subsidiary companies during the reporting period.
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	Company is maintaining records of necessary compliances which is applicable upon company.
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) The listed entity has provided detailed reasons along with confirmation whether the transactions	Yes	Based on Related party transaction filed in stock exchange as per Regulation 23 of SEBI (LODR) Regulations 2015.

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
	were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
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, 2015 within the time limits prescribed thereunder.	Yes	-
10	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	**No**	Company has not maintained structured digital database system as per Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
11	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 except as provided under separate paragraph herein (**).	Yes	Stock Exchange raised a few queries and sent email communication to company pertaining to queries. However, Company has resolved few queries and few queries are under process to resolve.

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	**Compliances with the following conditions while appointing/re-appointing an auditor**		
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	N.A. N.A. N.A.	There is no change in auditor during the financial year 2024-25.
2	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without	N.A.	There is no concern reported by Statutory Auditor of the

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
	specifically waiting for the quarterly Audit Committee meetings b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable. c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.	N.A.	Company. No Resignation of Statutory Auditor has not been taken place during the review period.
	ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.	N.A.	

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
		N.A.	
3	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	N.A.	There is no resignation of statutory auditor of the Company.

(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 (Regu-lations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amt.	Obser-vations/ Remarks of the Practicing Company Secretary	Man-age-ment Re-sponse	Re-marks
1.	Financial Results	Regulation 33/52 of SEBI (LODR) Regulations 2015.	**Standalone Results - There is mismatch of**	BSE	Email dated 02.01.2025	**Quarter Ended – September 2024.**	Nil	Discrepancies removed	Discrepancies removed	Status clear

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amt.	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
			Reporting Data of XBRL file while comparing with PDF filing							
2.	Non submission of Declaration under Regulation 31(4) of SEBI (SAST) Regulations, 2011	Regulation 31(4) of SEBI (SAST) Regulations, 2011	Non-submission	BSE	Email dated 19th May, 2025	Non-submission	Nil	Discrepancies removed	Discrepancies removed	Status clear

b) The listed entity has taken the following actions to comply with the observations made in previous reports

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
	Maintain a functional website containing basic information about the Company.	Regulation 46 and 62 of SEBI (LODR) Regulations 2015	-	BSE	E-mail dated 11.03.2023 By BSE	Non submission to BSE	Nil	Company is in process to comply such provision.	Under Process	Under process

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PLACE- AHMEDABAD

DATE- 30/05/2025
UDIN- A042662G000508963

For M K Chokshi & Associates

CS Mansi Chokshi
Proprietor
Membership No. A42662, COP:19645
Peer Review No. 6601/2025

M. K. CHOKSHI & ASSOCIATES
Practicing Company Secretaries
C/8, C/13, Hira Anand Tower, Gordhanwadi Cross Road,
Kankaria BRTS Road, Ahmedabad-380 028.
Mob. +91 7878735447 | E-mail: cs.mkchokshi@gmail.com

To,
Multiplus Holdings Limited
CIN-L65990MH1982PLC026425

The Secretarial Compliance Report of even date is to be read along with this letter.

1) Maintenance of secretarial records under Regulations, Circulars and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (SEBI ACT) and the Securities Contracts (Regulation) Act, 1956 (SCRA) Rules made thereunder, is the responsibility of the management of the listed entity. Our responsibility is to express an opinion on these records based on our audit.

2) We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of these records. The verification was done to ensure that correct facts are reflected in the said records. We believe that the processes and practices we followed, provide a reasonable basis for our opinion.

3) We have not verified the correctness and appropriateness of financial records and Books of Account of the listed entity.

4) The compliance of the provisions of SEBI ACT and SCRA Rules and Regulations, Circulars and Guidelines prescribed thereunder, is the responsibility of management. Our examination was limited to the verification of documents and records made available to us and explanations provided to us with respect to the practices and processes followed in matters relating to this Report.

5). The Secretarial Compliance Report 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- 30/05/2025
UDIN- A042662G000508963

For M K Chokshi & Associates

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CS Mansi Chokshi
Proprietor
Membership No. A42662, COP:19645
Peer Review No. 6601/2025