

**AAKANKSHA DUBEY & CO.**  
**PRACTICING COMPANY SECRETARY**

**SECRETARIAL COMPLIANCE REPORT OF SIGACHI INDUSTRIES LIMITED**  
**FOR THE YEAR ENDED 31.03.2026**

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SIGACHI INDUSTRIES LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at 229/1 & 90, Kalyan's Tulsiram Chambers, Madinaguda, Hyderabad, 500049 - Telangana. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon. Based on our verification of the listed entity's books, papers, forms and returns etc., and also the information provided by the listed entity, we hereby report the compliance status of the listed entity during the review period covering the financial year ended on 31st March, 2026 as mentioned below:

We, **Aakanksha Dubey & Co.**, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **SIGACHI INDUSTRIES LIMITED** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges (BSE Limited and National Stock Exchange of India Limited),
- (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 financial year ended 31<sup>st</sup> March, 2026 ("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;

Add: H. No. 11-1-439/301, 3<sup>rd</sup> Floor, Baba Residency, Sitaphalmandi, Secunderabad – 500061,  
Ph. 9989234382, e-mail–[aakanksha.shuklacs@gmail.com](mailto:aakanksha.shuklacs@gmail.com), GST: 36AWRPA9608B1ZK



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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable during the year under review;**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 to the extent applicable;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable during the year under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the year under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible) Regulations, 2021; **Not Applicable during the year under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder to the extent applicable;
- (h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.

and circulars/ guidelines issued thereunder;

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 there under wherever applicable, except in respect of matters specified below:

S r. N o	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	Entire pre-preferential allotment shareholding of the allottees, if any, shall be locked-in from the relevant date up to a period of 90 trading days from the date of	Regulation 167(6) of SEBI (ICDR) Regulations, 2018	Non compliance with pre issue lock-in provisions under SEBI ICDR Regulations	NSE	Advisory letter	The Company has applied for listing of 4,86,69,840 Equity shares of Re. 1/- each issued on Preferential basis with BSE and NSE.  However, while reviewing the said application, it was observed by NSE that one of the allottee namely, Ms. Riddhi had purchased and sold certain shares between the period of relevant date and date of allotment of	--	The Company was advised to be careful in future and exercise due diligence.	Appropriate corrective measures shall be implemented to strengthen internal controls to monitor trades by the proposed allottees.	--

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	allotment of such securities.					convertible securities and No. of shares transacted are less than 1% (0.04 %) of the no. of shares being allotted to the said allottee.  The gain earned is less than 1% (0.00 %) of the amount being raised from the said allottee.			
2	Filing of disclosure pertaining to details of appointment within 12 hours with Exchanges	Regulation 30 of SEBI (LODR), Regulations, 2015	Non-compliance of Regulation 30 of SEBI (LODR), Regulations, 2015	BSE	Clarification	Delay in disclosing the details of appointment of Chief People Officer to the Exchanges	--	The Company has submitted the clarification to BSE	The delay in submitting the details of appointment of Chief People Officer was primarily due to oversight. The management assures that timely compliance will be ensured in future

(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 for the year ended 31.03.2025	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	--	observations reported by Secretarial Auditor in Secretarial Compliance Report for financial year ended March 2024	-	--	--	The Company is adhering to the requirement of the applicable provisions / regulations as per SEBI (LODR) Regulations, 2015.

c) We hereby report that, during the Review Period the compliance status of the listed with the following requirements:

*(Handwritten Signature)*



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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 India (ICSI).	Yes	Nil
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 entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Nil
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 a separate section on the website</li> <li>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</li> </ul>	Yes	Nil
4.	<b>Disqualification of Director:</b> None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <p>a) The listed entity has obtained prior approval of Audit Committee for all related party</p>	Yes	Nil

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	<p>transactions;</p> <p>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</p>		
6.	<p><b>Preservation of Documents:</b></p> <p>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.</p>	Yes	Nil
7.	<p><b>Performance Evaluation:</b></p> <p>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.</p>	Yes	Nil
8.	<p><b>Related Party Transactions:</b></p> <p>a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>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.</p>	Yes  NA	Nil  The listed entity has obtained prior approval of Audit Committee
9.	<p><b>Disclosure of events or information:</b></p> <p>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.</p>	Yes	Nil
10.	<p><b>Prohibition of Insider Trading:</b></p> <p>The listed entity is in compliance with Regulation</p>		

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	3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>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)</p> <p><del>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</del></p>	Yes	Nil
12.	<p><b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b></p> <p>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	NA
13.	<p><b>No additional non-compliances observed:</b></p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	Yes	Nil

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**



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**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.
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.
5. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied with by the Company up to the date of this Report pertaining to the financial year ended March' 2026.
6. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on random test basis.
7. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

For Aakanksha Dubey & Co.



**Aakanksha Sachin Dubey**  
**Proprietor**

**ACS/FCS No. - A49041,**

**C.P. No.: 20064**

**UDIN: A049041H000496598**

**PR. No. 3363/2023**

**Firm Registration No. – S2025TS1021000**



**Place: Hyderabad**  
**Date: 27.05.2026**