

**SECRETARIAL COMPLIANCE REPORT OF
EVEREST ORGANICS LIMITED
FOR THE YEAR ENDED 31.03.2024**

We, D. Hanumanta Raju & Co, Company Secretaries, having our office at B-13, F-1, P.S.Nagar, Vijayanagar Colony, Hyderabad – 500 057 have examined:

- a) all the documents and records made available to us and explanation provided by **EVEREST ORGANICS LIMITED** ("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 documents/filing, as may be relevant, which has been relied upon to make this Report, for the financial year ended 31st March, 2024 ("Review Period") in respect of compliance with the provisions of:
 1. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 2. 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 (**Not applicable to the Listed Entity 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 (Buyback of Securities) Regulations, 2018 (**Not applicable to the Listed Entity during the review period**)



- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 **(Not applicable to the Listed Entity during the review period);**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021- **(Not applicable to the Listed Entity during the review period);**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) 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;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021- **(Not applicable to the Company during the review period)**

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 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.	The Listed Entity shall submit filings of Prior Intimation for Board Meetings in XBRL mode	BSE Circular No. 20230127-37 dated 27.01.2023.	The listed entity has not submitted the Prior Intimations of Board Meetings in XBRL mode	-	-	The submission of Prior Intimations of the Board Meetings in XBRL mode was not made	NIL	The Listed Entity has not intimated about the Prior Intimations of Board Meetings held on 27.05.2023 and 12.08.2023 in XBRL Mode	The intimation was inadvertently missed and the company is exercising precaution in all its future filings/submissions to the stock exchanges in compliance with the applicable SEBI Regulations. The Intimations in PDF mode were submitted	NIL
2	The Listed Entity shall submit filing of Annual Secretarial Compliance Report(ASCR) in XBRL mode	BSE Circular No.20230614-44 dated 14.06.2023	The listed entity has not submitted the Annual Secretarial Compliance Report (ASCR) in XBRL mode	-	-	The Submission of Annual Secretarial Compliance Report (ASCR) in XBRL mode was not made	NIL	The Listed Entity has not intimated the Annual Secretarial Compliance Report (ASCR) for the Financial Year ended 2022-23 in XBRL Mode	The intimation was inadvertently missed and the company is exercising precaution in all its future filings/submissions to the stock exchanges in compliance with the applicable SEBI Regulations. The Intimation in PDF mode was submitted	NIL



3	The Listed Entity shall submit filing of Notice of Share holders Meetings in XBRL mode	BSE Circular No. 20230331-87 dated 31.03.2023	The listed entity has not submitted the Notice of Share holders Meeting in XBRL mode	-	-	The submission of Notice of Share holders Meeting in XBRL mode was not made	NIL	The Listed Entity has not intimated the Notice of Share holders Meeting (AGM) held on 25.09.2023, in XBRL Mode	The intimation was inadvertently missed and the company is exercising precaution in all its future filings/submissions to the stock exchanges in compliance with the applicable SEBI Regulations. The Intimation in PDF mode was submitted	NIL
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(b) The Listed Entity has taken the following actions to comply with the observations made in previous reports: **Not applicable for the period under review.**

I. We 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 Standard: 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.	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	NIL
3.	Maintenance and disclosures on Website: • 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 re- directs to the relevant document(s)/section of the website.	Yes	NIL
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	NIL



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.	Not Applicable	Provisions with regard to subsidiaries are not applicable to the company.
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	NIL
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	NIL
8.	Related Party Transactions: (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 Not Applicable	NIL There are no such transactions.
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	NIL



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	NIL
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.	Yes	NIL
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.	Not Applicable	NIL
13.	Additional Non-Compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	Yes	NIL



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.

**Place: Hyderabad
Date : 27.05.2024**



**For D.HANUMANTA RAJU & CO
COMPANY SECRETARIES**

A handwritten signature in blue ink, appearing to read "Sh. Razia", with a horizontal line extending to the right.

**CS SHAIK RAZIA
PARTNER
FCS:7122, CP NO: 7824
UDIN: F007122F000455768
PR NO: 699/2020**