



**SURYALATA SPINNING MILLS LIMITED**

CIN-L18100TG1983PLC003962 - GST No : 36AADCS0823M1ZA

(An ISO 9001 : 2015 Certified Company)



**Date:** May 30, 2025

To  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Fort, Mumbai- 400001

Dear Sir/Madam,

**Sub: Submission of Annual Secretarial Compliance Report of the Company for the year ended March 31, 2024;**

**Ref: Scrip Code No. 5 1 4 1 3 8.**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2025 issued by M/s. Thimma Reddy & Associates, Company Secretaries, Hyderabad.

Please take note of the same on record.

Thanking you,

Yours Faithfully,

**FOR SURYALATA SPINNING MILLS LIMITED,**

MR. VITHAL DAS  
AGARWAL

Digitally signed  
by MR. VITHAL  
DAS AGARWAL

**VITHALDAS AGARWAL**

**Managing Director**

**DIN: 00012774**

**Annual Secretarial Compliance Report of  
SURYALATA SPINNING MILLS LIMITED  
for the year ended 31<sup>st</sup> March, 2025**

*[Pursuant to Regulation 24A(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

I, G. Thimma Reddy, Company Secretaries, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Suryalata Spinning Mills Limited, CIN: L18100TG1983PLC003962** (hereinafter referred as 'the listed entity'), having its Registered Office at 105, Surya Towers, 1st Floor, Sardar Patel Road, Secunderabad, Telangana, 500003. Secretarial Review was conducted in a manner that provided us with a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

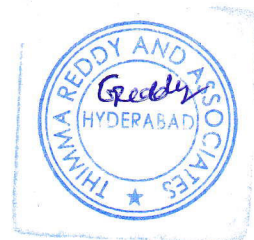
Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, We hereby report that the listed entity has, during the review period covering the Financial Year ended on **31.03.2025** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, have examined:

- (a) all the documents and records made available to us and explanation provided by 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 Financial Year ended **31<sup>st</sup> 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 there under; 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:-

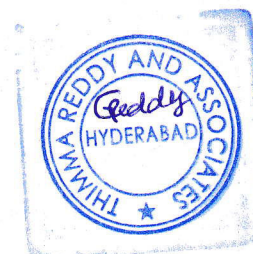
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **Not applicable during the reporting period**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; - **Not applicable during the reporting period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **Not applicable during the reporting period**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - **Not applicable during the reporting period**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Other Regulations as 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, except in respect of matters specified below:

| Sr. No.        | Compliance Requirement<br>(Regulations/ circulars / guidelines including specific clause) | Regulation/ Deviations Circular No. | Action Taken by | Type of Action                                                  | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary (PCS) | Management Response | Remarks |
|----------------|-------------------------------------------------------------------------------------------|-------------------------------------|-----------------|-----------------------------------------------------------------|----------------------|-------------|-----------------------------------------------------------------|---------------------|---------|
|                |                                                                                           |                                     |                 | Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc. |                      |             |                                                                 |                     |         |
| NOT APPLICABLE |                                                                                           |                                     |                 |                                                                 |                      |             |                                                                 |                     |         |

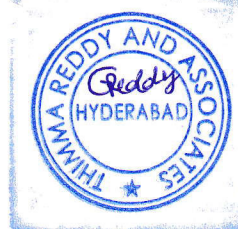


(b). The listed entity has taken the following actions to comply with the observations made in previous reports: **NIL**

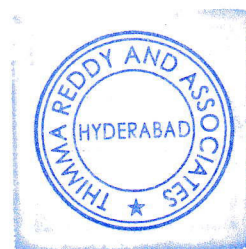
| Sr. No.               | Observations/ Remarks of the Practicing Company Secretary in the previous reports) (PCS) | Observations made in the secretarial compliance report for the year ended ..... (the years are to be mentioned) | Compliance Requirement (Regulations/ circulars/ guidelines including specific 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 |
|-----------------------|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------------|
| <b>NOT APPLICABLE</b> |                                                                                          |                                                                                                                 |                                                                                       |                                                                                                     |                                                      |                                                               |

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

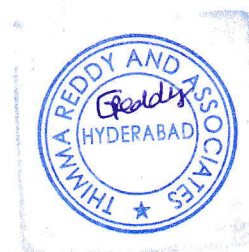
| Sr. No. | Particulars                                                                                                                                                                                                                                                                                                                                                                                                  | Compliance Status (Yes/No/NA) | Observations/ Remarks by PCS |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------|
| 1       | <b>Secretarial Standards:</b><br><br>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       | <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 entity.</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                           |                              |
| 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</li> </ul>                                                                                                                                                              | Yes                           |                              |



|   |                                                                                                                                                                                                                                                                                                                            |     |                                                                                                                                                                                     |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <p>the website.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>                                                                      |     |                                                                                                                                                                                     |
| 4 | <p><b>Disqualification of Director(s):</b><br/>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</p>                                                                                                                            | Yes |                                                                                                                                                                                     |
| 5 | <p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>a) Identification of material subsidiary companies.</p> <p>b) Disclosure requirement of material as well as other subsidiaries</p>                                                                                          | NA  | <p>The company does not have any material subsidiary</p> <p>(Suntree Solar Energy Private Limited is a wholly owned subsidiary which does not fall under "Material Subsidiary")</p> |
| 6 | <p><b>Preservation of Documents:</b><br/>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 (Listing Obligations and Disclosure Requirements) Regulations, 2015</p> | Yes |                                                                                                                                                                                     |
| 7 | <p><b>Performance Evaluation:</b><br/>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 |                                                                                                                                                                                     |
| 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; or</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed</p>                                                                       | Yes |                                                                                                                                                                                     |



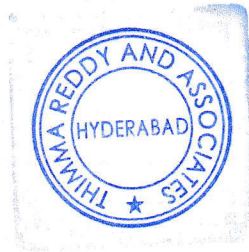
|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |     |  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--|
|    | reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.                                                                                                                                                                                                                                                                                                                                              |     |  |
| 9  | <b>Disclosure of events or information:</b><br>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 within the time limits prescribed thereunder.                                                                                                                                                                                         | Yes |  |
| 10 | <b>Prohibition of Insider Trading:</b><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.                                                                                                                                                                                                                                                                                                          | Yes |  |
| 11 | <b>Actions taken by SEBI or Stock Exchange(s), if any:</b><br>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 |  |
| 12 | <b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b><br>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 | <b>Additional non-compliances observed</b><br><br>No additional non-compliances observed for any SEBI Regulation/circular/guidance note etc. except as reported above.                                                                                                                                                                                                                                                                                                     | No  |  |



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.

**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.



**For Thimma Reddy & Associates  
Companies Secretaries**

*G.T. Reddy*

**Thimma Reddy Gattu  
Company Secretary in Practice  
C.P. No. :- 17718 M. No. :- 48701**

**Place: Hyderabad  
Date: 30/05/2025  
UDIN: A048701G000516465**