AMJ & ASSOCIATES
Company Secretaries

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

SECRETARIAL COMPLIANCE REPORT OF SHIVALIK RASAYAN LIMITED,
(CIN: L24237UR1979PLC005041)
FOR THE YEAR ENDED 31ST MARCH, 2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SHIVALIK RASAYAN LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at **Village Kolhupani, Post Office Chandanwari, Via, Prem Nagar, Dehradun - 248007**, Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on **March 31st, 2025**, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We, **AMJ & Associates,** Practicing Company Secretary have examined:

a. all the documents and records made available to us and explanation provided by **SHIVALIK RASAYAN 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 document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **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;
c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

AMJ & ASSOCIATES
Company Secretaries

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the Audit period)**

e. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity Shares) Regulations, 2021; **(Not applicable to the Company during the Audit period)**

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

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

h. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **(Not applicable to the Company during the Audit period)**

i. Securities and Exchange Board of India (Depository Participant) Regulations, 2018;

j. Securities and Exchange Board of India {KYC (Know Your Client) Registration Agency} Regulations, 2011.

k. Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.

l. Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices Relating To Securities Market) Regulations, 2003.

m. Securities and exchange board of India (Procedure for Board Meetings) Regulations, 2001.

n. Securities and Exchange Board of India (Employees 'Service) Regulations, 2001.

o. Securities and Exchange Board of India (Custodian) Regulations, 1996.

p. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.

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.	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**	**Nil**

AMJ & ASSOCIATES
Company Secretaries

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

(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 report(s) (PCS)	Observations made in the secretarial compliance report for the year ended 31.03.2024	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.	**SEBI (PIT) Regulation (Maintenance of SDD)**	**SEBI (PIT) Regulation (Maintenance of SDD)**	**Regulation 3(5) and 3(6) of SEBI(PIT) Regulation, 2015**	**Company has captured Compliance Officer name for all UPSI shared. Further, the Company is not capturing Sender's PAN details in Audit Trail**	**The Management has now rectified the SDD software as per the observations given by NSE**	**Management noted the observations and rectified the SDD software accordingly**

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 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).	**YES**	**-**
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 has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI.	**YES** **YES**	**-** **-**

AMJ & ASSOCIATES
Company Secretaries

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

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** **YES** **YES**	**-** **-** **-**
4	**Disqualification of Director:** None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by listed entity.	**YES**	**-**
5	**Details related to Subsidiaries of listed entities has been examined w.r.t.:** a) Identification of material subsidiary companies. b) Disclosure requirements of material as well as other subsidiaries.	**NIL** **NIL**	The Company does not have any Subsidiary.
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**	**-**
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**	**-**

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

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** **NA**	**-** Please refer point no. 8(a)
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	**YES**	-
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 Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	**YES**	**-**
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	**NA**	**No Such Event has occurred during the financial year under review.**

AMJ & ASSOCIATES
Company Secretaries

F-2, Plot No. 299, Sector-4, (Near Vaishali Metro Station)
Vaishali, Ghaziabad, U.P-201010
Ph. 0120-4138598, Mob.: 9811593878
E-mail: manojfcs@gmail.com
Website: www.amjassociates.in

	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.		
13	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/ circular/guidance note etc. except as reported above.	**YES**	**-**

We further, report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of LODR Regulations are **Not Applicable** to the listed entity.

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 certify 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 AMJ & ASSOCIATES
Company Secretaries
Peer Review No.: 1640/2021

MANOJ KUMAR JAIN
Digitally signed by MANOJ KUMAR JAIN
Date: 2025.05.30 12:21:48 +05'30'

Manoj Kumar Jain
(Proprietor)
FCS No. : 5832; C.P. No. : 5629

Date: 30.05.2025
Place: Ghaziabad
UDIN: F005832G000502438