



Secretarial Compliance Report

of

CCL PRODUCTS (INDIA) LIMITED

For the Financial Year ended 31.03.2025

To
The Board of Directors
CCL PRODUCTS (INDIA) LIMITED
Duggirala, Guntur – 522330.

- I. We, P.S. Rao & Associates, Company Secretaries, have examined:
- all the documents and records made available to us and explanations provided by **CCL PRODUCTS (INDIA) LIMITED**, having its Registered Office at Duggirala, Guntur – 522330, hereinafter referred to as **“the listed entity”**
 - the filings/ submissions made by the listed entity to the Stock Exchanges,
 - website of the listed entity,
 - any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2025 (“01.04.2024 to 31.03.2025”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - 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”);
- II. The Specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - Securities and Exchange Board of India (Issue of capital and disclosure requirements) Regulations, 2018; **(Not applicable to the Company during the review period)**



- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- The Depositories Act, 1996:
- 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; and circulars/ guidelines issued thereunder;

and circulars/ guidelines issued there under 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: -

S 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	N.A



Under

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

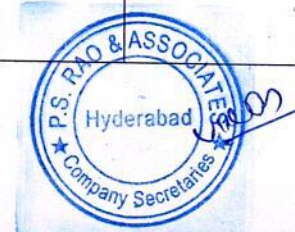
S No.	Observations / Remarks of the Practicing Company Secretary in previous reports	Observations made in the secretarial compliance report made in the year ended 31 st March, 2024	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation/ deviations and action taken/ penalty imposed, if any, on the listed entity	Remedial Action, if any taken by the listed entity	Comments of the PCS on the action taken by the listed entity
N.A	N.A	N.A	N.A	N.A	N.A	N.A



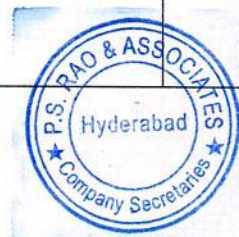
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(c) We hereby report that, during the review period the compliance status of the listed entity with following requirements:

Sl. No.	Particulars	Compliance Status (Yes/No/N A)	Observations/Remarks by PCS
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of listed entity are in accordance with the Secretarial Standards issued by ICSI, viz., SS-1 to SS-3</p>	Yes	N.A.
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity • All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	Yes	N.A.
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ information under aseparate 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	N.A.
4.	<p><u>Disqualification of Directors:</u></p> <p>None of the Directors of the Company is disqualified under Section 164 of the Companies Act, 2013</p>	Yes	N.A.
5.	<p><u>Details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	Yes	N.A.
6.	<p><u>Preservation of Documents:</u></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 SEBI LODR Regulations, 2015.</p>	Yes	N.A.



7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees towards the end of every financial year in accordance with prescribed SEBI Regulations	Yes	N.A.
8.	<u>Related Party Transactions:</u> The listed entity has generally obtained prior approval / omnibus approval of Audit Committee for all Related party transactions. However, in couple of transactions, ratification of committee was obtained on account of reasons as hereunder: i. in one case, the value of transaction exceeded the already approved limits and ii. in another case, the transaction had to be conducted owing to its urgency.	Yes	Nil
9.	<u>Disclosure of events or information:</u> 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	N.A.
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	N.A.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> 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	N.A.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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 provision of the LODR Regulations by listed entities.	N.A. (Refer Note below)	N.A.



13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	Yes	N.A.
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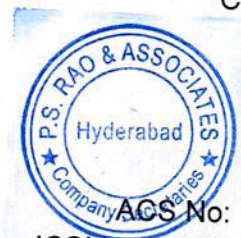
Note:

There was no instance of resignation of statutory auditor(s), in the listed entity during the year under report, hence the question of compliance of / or disclosures thereunder do not arise. However, the listed entity has ensured that the conditions as mentioned at para 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019, dated October 18, 2019, are included in the terms of appointment of the statutory auditor(s) at the time of their reappointment. The Company does not have any Indian material subsidiary during the Financial Year under review.

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 **P S Rao & Associates**
Company Secretaries



Vikas
Vikas Sirohiya
Partner

ACS No: 15116 C.P.No.5246
ICSI Unique Code: P2001TL078000
PR No.6678/2025
UDIN: A015116G000266730

Place: Hyderabad
Date: 05.05.2025