

SURAJ INDUSTRIES LTD

Registered Office -Plot No. 2 Phase-3, Sansarpur Terrace, Distt. Kangra, H.P.-173212

CIN: L26943HP1992PLC016791

Email id- secretarial@surajindustries.org; Website- www.surajindustries.org

Telephone No: 01970-256414

May 30, 2025

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

Scrip Code: 526211

Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2025 pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2025 issued by Mr. Ashok Ranjan Mishra ,Proprietor of M/s. A R Mishra & Associates, Practicing Company Secretaries.

Kindly take the same on record and display the same on the website of your exchange.

Thanking You,
Yours Truly,
Suraj Industries Ltd

SNEHLATA
SHARMA

Digitally signed by SNEHLATA SHARMA
DN: cn=SNEHLATA SHARMA, o=Suraj Industries Ltd,
c=IN, email=snehlata.sharma@surajindustries.org,
serial=1, version=3
Reason: I am the signer of this document.
Suraj Industries Ltd
Date: 2025.05.30 14:18:08 +05'30'

Snehlata Sharma
Company Secretary & Compliance Officer



A R MISHRA & ASSOCIATES

COMPANY SECRETARIES

OFFICE: 82-D, A.C. BLOCK ,SHALIMAR BAGH, DELHI 110088

SECRETARIAL COMPLIANCE REPORT OF SURAJ INDUSTRIES LIMITED FOR THE YEAR ENDED 31 MARCH 2025

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

We have examined:

- (a) all the documents and records made available to us and explanation provided by **SURAJ INDUSTRIES LIMITED** ("the listed entity") (CIN **L26943HP1992PLC016791** (hereinafter referred to as the "Company") having its registered office at Registered office at Plot no 2 Phase III, Sansarpur , Terrace ,Himachal Pradesh ,Kangra , - 173212..
- (b) the filings/submissions made by the Company to the stock exchanges,
- (c) website of the Company,
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification for the year ended 31 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 as amended till date(herein after referred as "**SEBI LODR, 2015**");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

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- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended till date;
- (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) 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; as amended till date; (**Not applicable to the Company during the Audit Period**)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended till date; and
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;

based on the above examination, we hereby report that, during the Review Period:

- (a) The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder

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



The Company has taken the following actions to comply with the observations made in previous reports:

<u>S. No.</u>	<u>Observations/ Remarks of the Practicing Company Secretary in the Previous reports</u>	<u>Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)</u>	<u>Compliance Requirement (Regulations / circular/ guidelines including specific clause)</u>	<u>Details of Violation/ deviations and actions taken/penalty imposed , if any, on the listed entity</u>	<u>Remedial actions, if any, taken by the listed entity</u>	<u>Comments of the PCS on the actions taken by the listed entity</u>
NOT APPLICABLE						

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

<u>S.No.</u>	<u>Particulars</u>	<u>Compliance Status (Yes / No/ NA)</u>	<u>Observations/ Remarks by PCS</u>
1.	<u>Secretarial Standard</u> The compliances of listed entities are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	YES	Nil
2.	<u>Adoption and timely updation of the Policies:</u>		
	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	Nil

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	All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	YES	Nil
3.	Maintenance and disclosures on Website:		
	• The Listed entity is maintaining a functional website	YES	Nil
	• Timely dissemination of the documents/ information under a separate section on the website	YES	Nil
	• 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	YES	Nil
4.	Disqualification of Director None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013	YES	Nil
5.	To examine details related to Subsidiaries of listed entities		
	• Identification of material subsidiary companies	YES	Company has a material subsidiary Company namely M/s. Carya Chemicals & Fertilizers Private limited.
	• Requirement with respect to disclosure of material as well as other subsidiaries	YES	Nil
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records	YES	Nil



	as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015		
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:		
	• The Listed entity has obtained prior approval of Audit Committee for all Related party transaction	YES	Nil
	• In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transaction were subsequently approved/ ratified/ rejected by the Audit Committee	NA	All Related party transactions were entered after obtaining prior approval of the audit committee.
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 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	None
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.	NA	The statutory auditors have not resigned during the review period.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI /circular/guidance note etc.	Yes	No non-compliance was observed

- a) We hereby confirm that the company has not issued any Employees Benefit Scheme and therefore the disclosure as required under regulation 46(2) (za) of the SEBI LODR read with SEBI circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated 31st December, 2024 is not applicable on the company.

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

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(2) of the LODR Regulations 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.

Date: 27.05.2025

Place: New Delhi

UDIN: : F005377G000452516

**For A.R.MISHRA & ASSOCIATES
Company Secretaries**



(ASHOK RANJAN MISHRA)

PROPRITER

B. Com, LL.B. F.C.S.

FCS 5377, C P 22727

Peer Review NO 6471/2025

FRN S2020DE715600.