

Date: 29.05.2026

To,  
Corporate Relationship Department,  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers, Dalal Street,  
Mumbai- 400 001

**Scrip Code: SULABEN (508969), ISIN: INE673M01029**

**Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2026 as per Regulation 24A of SEBI (LODR) Regulations, 2015**

Dear Sir/Madam,

Please find enclosed herewith Pursuant to Regulation 24(A) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 enclosed herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2026 duly certified by Mr. Gopesh Sahu Proprietor of M/s Gopesh Sahu, Practising Company Secretary.

This is for your information and records.

Thanking You,

**FOR Sulabh Engineers and Services Limited**

**Tauheed Ahmad**  
**Company Secretary & Compliance Officer**  
**(Membership No.: A74592)**



*Gopesh Sahu*

Practicing Company Secretary  
SOCIAL IMPACT ASSESSOR (ICSI-ISA), L.L.B.

Ref. ....

Dated.....

## **ANNUAL SECRETARIAL COMPLIANCE REPORT**

(Pursuant to the SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8<sup>th</sup> February, 2019)

OF

### **SULABH ENGINEERS AND SERVICES LIMITED**

**For the year ended 31.03.2026**

I, **CS Gopesh Sahu**, Proprietor of M/s Gopesh Sahu, Company Secretary have examined:

- (a) All the documents and records made available to me and explanation provided by the Management of the company **SULABH ENGINEERS AND SERVICES LIMITED**, (CIN L28920MH1983PLC029879) ("the Listed Entity")
- (b) The filings/ submissions made by the listed entity to the BSE Ltd.,
- (c) Website of the Sulabh Engineers and Services Limited,
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the financial year ended **31<sup>st</sup> March, 2026** ("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) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) SEBI (Buyback of Securities) Regulations, 2018
- (e) SEBI (Share Based Employee Benefits) Regulations, 2014;
- (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008;



1 | Page

(g) SEBI (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) SEBI (Prohibition of Insider Trading) Regulations, 2015;

and Circulars/ guidelines issued there under; and based on the above examination, I hereby report that, during the Review Period:

- a) The regulations mentioned above under (b) and (d) to (g) were not applicable for the reporting period. However The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under as applicable to it, except in respect of matter specified below :

Sr No.	Compliance Requirement (Regulations, Circulars, Guidelines)	Regulation/ Circular No	Deviation	Action Taken By the Stock Exchange	Type of Action	Detail of Violation	Fine Amount	Observation/Remarks of Practising Company Secretary	Remarks
1.	NA	NA	NA	NA	NA	NA	NA	NA	NA

The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.

During the period under review *Mr. Amit Kumar Kanaujia, the Company Secretary and Compliance Officer* of the company had *resigned* on 13<sup>th</sup> day of June 2025 and **Mr. Tauheed Ahmad** was appointed as the Company Secretary and Compliance Officer of the company w.e.f.- 14<sup>th</sup> day of June 2025.

The company had made due compliances with respect to change in the Key Managerial Personnel- CS and Compliance officer, of the Company taking effect due to resignation of previous Company Secretary and Compliance Officer and appointment of new Company Secretary and Compliance Officer.

Furthermore, during the reporting period, **Mr. Vivek Awasthi (DIN: 06961442)** was appointed as the Independent Director of the company w.e.f. 12<sup>th</sup> day of August 2025 and *Mr. Vijay Kumar Jain (DIN: 08208856), the Independent Director* of the company *resigned* from the directorship of the company on 12<sup>th</sup> day of August 2025.

The company has made due compliances with respect to the appointment and resignation of the directors thereof, under the reporting period.



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

<u>Sr. No.</u>	<u>Observations of the Practicing Company Secretary in the previous reports</u>	<u>Observations made in the secretarial compliance report for the year ended</u>	<u>Actions taken by the listed entity, if any</u>	<u>Comments of the Practicing Company Secretary on the actions taken by the listed entity</u>	<u>Management Response</u>	<u>Remarks</u>
01	Company has made clerical error in stating total members of the Committee of the Companies as well as stating the No of independent Directors Present in the meeting of the Audit Committee	Company has made clerical error in stating total members of the Committee of the Companies as well as stating the No of independent Directors Present in the meeting of the Audit Committee	Company has filed the revised Corporate Governance Report on 25 <sup>th</sup> June 2024 after resolving the clerical error committed in the previous report.	Company has filed the revised Corporate Governance Report on 25 <sup>th</sup> June 2024 after resolving the clerical error committed in the previous report.	Company has filed the revised Corporate Governance Report on 25 <sup>th</sup> June 2024 after resolving the clerical error committed in the previous report.	The company has filed the revised Corporate Governance Report rectifying the clerical error previously made.

I also report that during the review period the compliance status of the listed entity with the following requirements:

<u>Sr. 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 the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	YES	--



2.	<p><b><u>Adoption and timely Updation of the Policies:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company.</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per , the regulations/ circulars/ guidelines issued by SEBI.</li> </ul>	YES	--
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <p>The Company is maintaining a functional website.</p> <p>Timely dissemination of the documents/ information under a separate section on the website.</p> <p>Web-links provided in annual/quarterly corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.</p>	YES	--
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</p>	YES	--
5.	<p><b><u>To examine details related to Subsidiaries of listed entities:</u></b></p> <p>(a) Identification of material subsidiary companies;</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</p>	YES	--
6.	<p><b><u>Preservation of Documents:</u></b></p> <p>The Company 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	--



7.	<b><u>Performance Evaluation:</u></b> The Company 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	--
8.	<b><u>Related Party Transactions:</u></b> (a) The Company has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee	YES	--
9.	<b><u>Disclosure of events or information:</u></b> The Company 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.	<b><u>Prohibition of Insider Trading:</u></b> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	--
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b> No Actions taken against the Company/ 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><u>Additional non-compliances, if any:</u></b> No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	YES	--



**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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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: Kanpur**  
**Date: 19/05/2026**



**CS GOPESH SAHU**  
**FCS No.:7100**  
**CP No.: 7800**  
**Peer Review Certificate No.: 1515/2021**  
**UDIN: F007100H000408105**