DHIRREN R. DAVE & CO.
Company Secretaries
B-103, International Commerce Center (ICC), Near Kadiwala School,
Ring Road, SURAT- 395002, Phone: 0261-2460903, 2475122, 9879104642,
Email:contact@drdcs.net

Annual Secretarial Compliance Report of Sumeet Industries Limited
For The Financial Year Ended 31st March, 2026

To
The Members,
Sumeet Industries Limited
504, Trividh Chamber, 5th Floor,
Opp. Fire Brigade Station, Ring Road,
Surat-395002, Gujarat, India

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s **Sumeet Industries Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at 504, Trividh Chamber, 5th Floor, Opp. Fire Brigade Station, Ring Road, Surat-395002, Gujarat, India. Secretarial Review was conducted in a manner that provided us 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 31.03.2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We, M/s Dhirren R Dave& Co.,Practicing Company Secretaries, have examined:

(a) all the documents and records made available to us and explanation provided by Sumeet Industries 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 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 there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under,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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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

(d) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

Date: 22.05.2026 2 UDIN: A028554H000445454

DHIREN DAVE & CO. SURAT

There are no events occurred during the year which attracts provisions of following regulations hence they are not applicable.

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

(f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

(h) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021

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 matter specified in **Annexure-I.**

(b)The listed entity has taken the actions to comply with the observations made in previous reports as per **Annexure-II.**

(c)We hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	**Particulars**	**Compliance status (Yes/ No/ NA)**	**Observations/ Remarks by PCS**

Date: 22.05.2026

UDIN: A028554H000445454

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). as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
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	None
3	**Maintenance and disclosures onWebsite**: • The Listed entity is maintaining a functional website	Yes	None

Date: 22.05.2026

UDIN: A028554H000445454

	• 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.		
4	**Disqualification of Director**: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	None
5	**To examine details related to Subsidiaries of listed entities**: (a) Identification of material subsidiary companies (b) Disclosurerequirement of material as well as other subsidiaries.	Yes	None
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	None

Date: 22.05.2026

UDIN: A028554H000445454

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	None
8	**Related Party Transactions**: (a)The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b The listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit committee.	Yes	None
9	**Disclosure of events orinformation**: 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	None
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	None
11	**Actions taken by SEBI or Stock Exchange(s), if any**: Actions	As per Annexure-I	As per Annexure-I

	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		
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 SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 on compliance with the provisions of the LODR Regulations by listed entities.	NA	There was no resignation of the Statutory auditor during the Financial Year ended March 31, 2025.
13	**Additional Non-compliances, if any:** No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	Yes	None

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. - NA as no such event during the FY 2025-26

Date: 22.05.2026 UDIN: A028554H000445454

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.

Place: SURAT
Date: 22.05.2026

For DHIRREN R. DAVE& CO.,
COMPANY SECRETARIES
UIN: P1996GJ002900
P/R No. : 2144/2022

PINAL KANDARP SHUKLA
Principal Partner
ACS: 28554, CP: 10265
UDIN:A028554H000445454

Sumeet Industries Limited- Annual Secretarial Compliance Report 31.03.2026 Annexure-I

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.	Regulation 29 of SEBI (LODR) Regulation 2015	Regulation 29 of SEBI (LODR) Regulation 2015	Advance Intimation of the Board Meeting held on 24.04.2025	National Stock Exchange of India Limited	Query raised vide Email dated 06.05.2025	The Company has not given advance notice of 2 days (Excluding the date of the intimation and date of the meeting).	NA	Company has replied vide email dated 06.05.2025 that company have complied the regulation 29 of SEBI (LODR) Regulation 2015	No further clarification asked by NSE till the current date regarding this matter	-
2.	Query regarding Shareholding Pattern dated 31.03.2025	Query regarding Shareholding Pattern dated 31.03.2025	Name of Promoter and Promoter Group entities which was in the previous quarter not Available in quarter ended on March 2025	BSE Limited	Email dated 07.05.2025.	Name of Promoter and Promoter Group entities which was in the previous quarter not Available in quarter ended on March	NA	Company has replied vide email dated 08.05.2025	No further clarification asked by NSE till the current date regarding this matter	-

Date : 22.05.2026

DHIREN R. DAVE & CO. SURAT COMPANY SECRETARIES

UDIN:A028554H000445454

						2025				
3.	Warning Letter	Warning Letter	Disclosure of PAN No of related parties	National Stock Exchange of India Limited	Warning vide Email dated 04.06.2025	PAN Card Number of the related party disclose by the company	NA	Company has replied vide email dated 06.06.2025 that company will be careful in future, exercise due caution and initiate corrective steps to avoid such non-compliance.	No further clarification asked by NSE till the current date regarding this matter	-
4.	Clarification for delay in submitting the outcome of the board meeting held on 08.10.2024	Clarification for delay in submitting the outcome of the board meeting held on 08.10.2024	The Board Meeting held on 08.10.2024 have started on 04.30 PM and Closed on 05.00 PM but was file 02.00 Minutes Delay	National Stock Exchange of India Limited	Clarification sought vide Email dated 18.05.2025	Delay in submitting the outcome of the Board Meeting held on 08.10.2024	NA	Company has replied vide email dated 20.05.2025 due to error on portal for change of password this delay happens.	No further clarification asked by NSE till the current date regarding this matter	-

DHIREN P. DAVE & CO. SURAT COMPANY SECRETARIES

5.	Quarterly submission of Shareholding Pattern for March 31, 2025	Quarterly submission of Shareholding Pattern for March 31, 2025	There is change in the public category, Change in the number of Promoter and Promoter Group, Changes in the SDD, Change in the number of share of one of the promoter as on March 31, 2025 Compare to December 31, 2024	National Stock Exchange of India Limited	Clarification sought vide Email dated 09.07.2025	There is change in the public category, Change in the number of Promoter and Promoter Group, Changes in the SDD, Change in the number of share of one of the promoter as on March 31, 2025 Compare to December 31, 2024	NA	Company has replied vide email dated 17.07.2025	No further clarification asked by NSE till the current date regarding this matter	-
6.	Quarterly submission of Shareholding Pattern for June 30, 2025	Quarterly submission of Shareholding Pattern for June 30, 2025	Changes in the Types of Promoter and Promoter Group for June 30, 2025 compare to March 31, 2025	National Stock Exchange of India Limited	Clarification sought vide Email dated 12.08.2025	Changes in the Types of Promoter and Promoter Group for June 30, 2025 compare to March	NA	Company has replied vide email dated 12.08.2025	No further clarification asked by NSE till the current date regarding this matter.	-

						31, 2025				
7.	Query letter regarding difference in SDD and SHP	Query letter regarding difference in SDD and SHP	Query letter regarding difference in SDD and SHP	National Stock Exchange of India Limited	Clarification sought vide Email dated 07.11.2025	Promoter/ promoter group showing in SDD are not appearing in shareholding pattern (SHP)	NA	Company has replied vide email dated 20.11.2025	No further clarification asked by NSE till the current date regarding this matter	-
8.	Discrepancies in the Shareholding pattern for the period ended on December 31, 2025 and regarding minimum public shareholding	Discrepancies in the Shareholding pattern for the period ended on December 31, 2025	Change in the shareholding pattern of promoter/promoter group and the minimum shareholding pattern is fallen below 25%	BSE Limited	Discrepancies receive through vide Email dated 06.02.2026	change in the shareholding pattern of promoter/ promoter group for the period December 31, 2025 and minimum shareholding fallen below 25%.	NA	Company has replied vide email dated 06.02.2026.	No further clarification asked by NSE till the current date regarding this matter	-
9.	Clarification regarding The treatment of exceptional item, long term loan and advances and regarding related party	Clarification regarding The treatment of exceptional item, long term loan and advances	Clarification regarding The treatment of exceptional item, long term loan and advances	National Stock Exchange of India Limited	Clarification sought vide Email dated 12.01.2026	Treatment of exceptional items in the cash flow statement, Breake up of long	NA	Company has replied vide email dated 10.02.2026 with CA Certificate.	No further clarification asked by NSE till the current date regarding this matter	-

	transactions for financial year 2024-25	and regarding related party transactions for financial year 2024-25	and regarding related party transactions for financial year 2024-25			terms loans and advances and related party transactions for financial year 2024-25				
10.	Clarification in Shareholding pattern for June 30, 2025	Clarification in Shareholding pattern for June 30, 2025	Promoter/ Promoter group in SDD not appearing as promoter/ promoter group as per table II of shareholding pattern or vica-versa	National Stock Exchange of India Limited	Letter dated 04.03.2026	Promoter/ Promoter group in SDD not appearing as promoter/ promoter group as per table II of shareholding pattern or vice-versa	NA	Company has replied vide email dated 23.04.2026	No further clarification asked by NSE till the current date regarding this matter	-

DHIREN R. DAVE & CO. SURAT COMPANY SECRETARIES

Sr. No.	Observations / Remarks of the Practicing Company Secretary	Observations made in the Secretarial Compliance report for the year ended 2024-25	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause	Details of violation/Deviation and actions taken/ penalty imposed if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comment of the PCS on the actions taken by the Listed entity
1.	Clarification sought vide Email dated 23.10.2024 by BSE Limited regarding Discrepancies in Corporate Governance Report for the Quarter ended September 30, 2024, and Company has replied vide email dated 23.10.2024 that company was under CIRP hence Audit Committee has been suspended during that period.		Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Audit Committee meeting details not provided in Corporate Governance Report	No remedial actions require as matter resolved in FY 2024-25 only.	Not Applicable as no remedial actions require.
2.	Clarification sought vide Email dated 21.02.2025 by BSE Limited regarding discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024, Company has replied vide email dated 21.02.2025.		Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Audit Committee - Previous quarter meeting date not provided in Corporate Governance Report, Discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024	No remedial actions require as matter resolved in FY 2024-25 only	Not Applicable as no remedial actions require

DHIREN R. DAVE & CO. SURAT COMPANY SECRETARIES

3.	Letter dated 19.03.2025 from BSE Limited regarding Non-Compliance of Regulations 18(1) , 19 and 20 of SEBI (LODR)Regulations 2015 for which fine of Rs.1,69,920/- imposed on the company and Company has paid fine on 23.04.2025	Non-Compliance of Regulations 18(1) , 19 and 20 of SEBI (LODR) Regulations	Non Constitution of Audit Committee , Stakeholders Relationship Committee and Nomination and Remuneration Committee for a period of 24 days from the date of Hon'ble NCLT order and paid Fine of Rupees 1,69,920/-	No remedial actions require as matter resolved in FY 2025-26 only	Not Applicable as no remedial actions require
4.	Clarification sought vide Email dated 09.11.2024 by National Stock Exchange of India Limited regarding Discrepancies in Corporate Governance Report for the Quarter ended September 30, 2024 and Company has replied vide email dated 09.11.2024.	Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	1. No Woman Director on the Board not complied till 01-Sep-2024. 2. Change in Composition 3. Change in Composition 4. Change in Composition 5. Change in category of Director	No remedial actions require as matter resolved in FY 2024-25 only.	Not Applicable as no remedial actions require.
5.	Clarification sought vide Email dated 19.11.2024 by National Stock Exchange of India Limited regarding prior approval of shareholders of the company and Company has replied vide email dated 20.11.2024 that approval of shareholders taken vide AGM dated 30.09.2024.	Regulation 23(9) of SEBI (LODR) Regulations, 2015	Whether prior approval of shareholders taken or not is not intimated	No remedial actions require as matter resolved in FY 2024-25 only.	Not Applicable as no remedial actions require.

DHIREN R. DAVE & CO. SURAT COMPANY SECRETARIES

6.	Clarification sought vide Email dated 12.02.2025 by National Stock Exchange of India Limited regarding Discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024 and Company has replied vide email dated 12.02.2025.	Regulation 27(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Gap between two consecutive Audit Committee Meeting is more than 120 days for quarter ended December 2024, Discrepancies in Corporate Governance Report for the Quarter ended December 31, 2024	No remedial actions require as matter resolved in FY 2024-25 only.	Not Applicable as no remedial actions require.
7.	Clarification sought vide Email dated 07.03.2025 by National Stock Exchange of India Limited regarding Quarterly submission of shareholding pattern for December 31, 2024. Company has replied vide email dated 18.03.2025.	Quarterly submission of shareholding pattern for December 31, 2024	Difference in shareholding pattern submitted in current and previous quarter	No remedial actions require as matter resolved in FY 2024-25 only.	Not Applicable as no remedial actions require.
8.	Letter dated 17.03.2025 received from National Stock Exchange of India Limitedregarding Non-Compliance of Regulations 18(1) , 19 and 20 of SEBI (LODR) Regulations2015 for which fine of Rs.1,69,920/- imposed on the company and Company has paid fine on 30.04.2025.	Non-Compliance of Regulations 18(1) , 19 and 20 of SEBI (LODR) Regulations	Non Constitution of Audit Committee, Stakeholders Relationship Committee and Nomination and Remuneration Committee for a period of 24 days from the date of Hon'ble NCLT order. and paid Fine of Rupees 1,69,920/-	No remedial actions require as matter resolved in FY 2024-25 only	Not Applicable as no remedial actions require.

DHIREN R. DAVE SURAT COMPANY SECRETARIES