

ECOBOARD INDUSTRIES LTD

ECOBOARD®

Date: 28th May, 2025

To,
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai - 400 001

Ref: - Symbol/ Scrip Code: - ECOBOAR/523732

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 for the year ended on 31st March, 2025.

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued to the Company viz. Ecoboard Industries Limited by M/s SD Kolhe & Company through CS Satish Kolhe, (Membership No.: A61229 & COP: 23879) Practicing Company Secretary, for the Financial Year ended **31st March, 2025.**

Request you to kindly take the same on record.

Thanking you,

Yours sincerely,

For Ecoboard Industries Limited

Praveen Kumar
Raju Gottumukkala
Digitally signed by Praveen
Kumar Raju Gottumukkala
Date: 2025.05.28 11:13:53
+05'30'

Praveen Kumar Raju Gottumukkala
Whole Time Director
DIN: 05180152

Encl.: Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015

Corporate Office: "ECOHOUSE", 65/1-A Akarshak Building, Opp. Nal Stop Karve Road, Pune 411 004
info@ecoboard.in 020-2543 2345 www.ecoboard.in GST No.: 27AAACE7375B1ZS





Satish D Kolhe
CS, BBA

S D Kolhe & Company
Company Secretaries

Secretarial compliance report of Ecoboard Industries Limited for the year ended March 31, 2025

- A. I Satish Dattatray Kolhe (Practicing Company Secretary) have examined:
- (a) all the documents and records made available to us and explanation provided by Ecoboard Industries Limited (CIN: L24239MH1991PLC064087) ("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 March 31 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");
- B. 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; - Not Applicable During Reporting Period
 - (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - Not Applicable During Reporting Period
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - Not Applicable During Reporting Period
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable During Reporting Period
 - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - Not Applicable During Reporting Period
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (i) (other regulations as applicable) and circulars/ guidelines issued thereunder;

**Office Address: First Floor, Belleza House, Kranti Park Lane
1, Near Manipal Hospital, Kharadi, Pune 411014.**

**Email: cs.satishkolhe@gmail.com
Mob: 8329883120, 8237857960**



C. (**) 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	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 - Reclassification of the status of any person as a promoter or public shall be permitted by the stock exchanges only upon receipt of an application from the listed entity along with all relevant documents.	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	The Company have applied for Promoters reclassification on 02/10/2021 to BSE and on 02/05/2024, BSE rejected application by sending email communication to the company	-	-	The Company have applied for Promoters reclassification on 02/10/2021 to BSE and on 02/05/2024, BSE rejected application by sending email communication to the company	-	The Company have applied for Promoters reclassification on 02/10/2021 to BSE and on 02/05/2024, BSE rejected application by sending email communication to the company	The Company have applied for Promoters reclassification on 02/10/2021 and it was rejected on 02/05/2024 further the company is in the process to file revised application by making correction/compliance directed by BSE.	-
2	Regulation 23(3)(C)(i) of - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 - The Company shall Comply the limit of maximum transaction amount as specified by Audit committee in omnibus approval.	Regulation 23(3)(C)(i) of - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	The transaction(s) undertaken exceeded the threshold limit approved by the Audit Committee under the omnibus approval mechanism, which is not in line with the requirement that all transactions must remain within the limits specified by the Audit Committee while granting omnibus approval.	-	-	The Company has not complied with the prescribed limit of maximum transaction amount as specified by the Audit Committee under the omnibus approval granted for related party transactions, thereby resulting in a deviation from the provisions of Regulation 23(3)(c)(i) of the SEBI	-	During the audit period under review, it was observed that the Company has not complied with the prescribed limit of maximum transaction amount as specified by the Audit Committee under the omnibus approval granted for related party transactions, thereby resulting in a deviation from the	The Company has taken note of the deviation and has initiated steps to strengthen internal control mechanisms to ensure that all related party transactions under omnibus approval remain within the prescribed thresholds and comply	-



						(Listing Obligations and Disclosure Requirements) Regulations, 2015.	provisions of Regulation 23(3)(c)(i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	with the applicable regulatory framework going forward.	
3	The Listed Entity shall file Compliance Certificate received by RTA (Demat) Within 15 days to Stock Exchange.	74(5) of SEBI (Depositories and Participants) Regulations 2018	It was observed that the Company did not submit the Compliance Certificate received from the Registrar and Transfer Agent (RTA), as required under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018, within the prescribed period of 15 days from the end of the respective quarter to the Stock Exchange.			The Company did not submit the Compliance Certificate received from the Registrar and Transfer Agent (RTA), as required under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018, within the prescribed period of 15 days from the end of quarter March 2024 and December 2024.	It was observed that the Company did not submit the Compliance Certificate received from the Registrar and Transfer Agent (RTA), as required under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018, within the prescribed period of 15 days from the end of the respective quarter to the Stock Exchange.	The delay in filing the Compliance Certificate under Regulation 74(5) for the said quarter was inadvertent and unintentional. The Company had received the certificate from its Registrar and Transfer Agent (RTA); however, due to internal oversight and procedural delays, the submission to the Stock Exchange was made after the prescribed due date.	
4	The Company should file Statement of Investor Complaints/ Grievance Redressal Mechanism under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, within the prescribed time limit of 21 days from the end of each quarter	Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	During the audit period, it was observed that the Company did not file the Statement of Investor Complaints/ Grievance Redressal Mechanism under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended March 2025.			The Company did not file the Statement of Investor Complaints/ Grievance Redressal Mechanism under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended March 2025.	It was observed that the Company did not file the Statement of Investor Complaints/ Grievance Redressal Mechanism under Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the quarter ended March 2025.	The Company acknowledges the delay/non-filing of the Statement of Investor Complaints under Regulation 13(3) of the SEBI (LODR) Regulations, 2015, for the respective quarter(s) of the financial year 2024-	



								25. The delay was inadvertent and occurred due to an internal oversight.	
5	Regulation 27(2) of the SEBI (LODR) Regulations, 2015 mandates listed entities to submit a quarterly Corporate Governance Report within 21 days from the end of each quarter	Regulation 27(2) of the SEBI (LODR) Regulations, 2015	The Company failed to file the Quarterly Corporate Governance Report as required under Regulation 27(2) of the SEBI (LODR) Regulations, 2015, within the prescribed timeline of 21 days from the end of the quarter March 2025			The Company failed to file the Quarterly Corporate Governance Report as required under Regulation 27(2) of the SEBI (LODR) Regulations, 2015, within the prescribed timeline of 21 days from the end of the quarter March 2025		It was observed that the Company failed to file the Quarterly Corporate Governance Report as required under Regulation 27(2) of the SEBI (LODR) Regulations, 2015, within the prescribed timeline of 21 days from the end of the quarter March 2025	The delay/non-filing of the Corporate Governance Report was inadvertent and occurred due to internal procedural gaps and oversight. The Company has identified the lapse and initiated remedial measures to ensure timely compliance in future
6	As per Regulation 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed entity is required to submit a statement showing the shareholding pattern within 21 days from the end of each quarter	Regulation 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company did not file the Shareholding Pattern for the quarter ended December 31, 2024, within the prescribed timeline of 21 days from the end of the quarter. The same was filed on January 23, 2025, resulting in a delay. Further , for the quarters ended June 30, 2024, and September 30, 2024, the Company filed revised Shareholding Patterns, indicating errors in the initial submissions.			The Company did not file the Shareholding Pattern for the quarter ended December 31, 2024, within the prescribed timeline of 21 days from the end of the quarter. The same was filed on January 23, 2025, resulting in a delay. Further , for the quarters ended June 30, 2024, and September 30, 2024, the Company filed revised Shareholding Patterns, indicating errors in the initial submissions.		It was observed that the Company filed the Shareholding Pattern for the quarter ended December 2024 after the statutory due date (i.e., on January 23, 2025), and submitted revised Shareholding Patterns for the June and September 2024 quarters, indicating deficiencies in the original filings.	The delay in submission for the December 2024 quarter and the subsequent revisions for June and September 2024 were inadvertent and unintentional.



7	As per Regulation 3(5) read with Regulation 3(6) of the SEBI (PIT) Regulations, 2015: The Company is mandated to maintain a Structured Digital Database containing the names of persons with whom Unpublished Price Sensitive Information (UPSI) is shared along with the Permanent Account Number (PAN) or any other identifier.	Regulation 3(5) read with Regulation 3(6) of the SEBI (PIT) Regulations, 2015	During the review for the quarter ended March 31, 2025, it was observed that the Company did not maintain a Structured Digital Database (SDD) as required under Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.			The Company did not maintain a Structured Digital Database (SDD) as required under Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, for the quarter ended March 31, 2025.	It is observed that the Company did not maintain a Structured Digital Database (SDD) as required under Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, for the quarter ended March 31, 2025.	The Company acknowledges that the Structured Digital Database (SDD) was not maintained during the quarter ended March 2025. This was due to non-availability of Company Secretary of the Company.
8	As per the SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window should have been closed at least two days prior to the end of the quarter.	SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window	The Company intimated the closure of the Trading Window on March 31, 2025, which is not in line with the prescribed regulatory requirement. As per the SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window should have been closed at least two days prior to the end of the quarter, i.e., on or before March 29, 2025.			This constitutes a violation of Clause 4 of Schedule B read with Regulation 9(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015	It was observed that the Company delayed the intimation of Trading Window Closure for the quarter ended March 31, 2025, which is a non-compliance with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015, and the Company's Code of Conduct for prevention of insider trading.	The delay in the intimation of Trading Window closure for the quarter ended March 31, 2025, was inadvertent and occurred due to an oversight in updating the compliance calendar.



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

Sr. No.	Com-pliance Require-ment (Regu-lations/ circulars/ guide-lines including specific clause)	Regu-lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Remedial actions, if any, taken by the listed entity	Commen-t s of the PCS on the actions taken by the listed entity
1	In case of any change or appointment of a new share transfer agent, the listed entity shall enter into a tripartite agreement between the existing share transfer agent, the new share transfer agent and the listed entity, in the manner as specified by the Board from time to time.	Regulation 7(4) of SEBI (LODR) Regulation, 2015	The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023			The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023		The company has appointed new Share Transfer Agent M/s Alankit Assignments Limited w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023	Upon identification of the lapse in compliance related to the tripartite agreement, the Company has executed tripartite agreement dt. 20/12/2023	the Company has acknowledged the non-compliance of Regulation 7(4) in the previous year and has since undertaken appropriate remedial actions.
2	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 - Re-classification of the status of any person as a promoter or public shall be permitted by the stock exchanges only upon receipt of an application from the listed entity along with all relevant documents.	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015	The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company			The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company		The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company	Upon identifying the lapse in regulatory compliance regarding the re-classification of promoter(s)/public shareholder, the company is in the process to file revised application by making correction/compliance directed by BSE.	It is noted that the Company had previously failed to comply with the procedural requirements under Regulation 31A in relation to the re-classification of certain shareholders.



3	With reference to Amendment to SEBI (Prohibition of Insider Trading) Regulations, 2015 - Code of Conduct for Listed Companies - Trading Window Restriction - Trading window for dealing in securities shall remain closed from the end of the quarter up to 48 hours after declaration of result.	Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015	For the Quarter ended June 2023 trading window closed on 7th July 2023.			For the Quarter ended June 2023 trading window closed on 7th July 2023.	For the Quarter ended June 2023 trading window closed on 7th July 2023.	Upon recognition of the procedural lapse regarding the Trading Window closure, the Company has implemented and updated Compliance Calendar	It is observed that in the previous year, the Company did not fully comply with the amended requirement under SEBI PIT Regulations with respect to the timely closure of the trading window
4	The Listed Entity shall file Compliance Certificate received by RTA (Demat) Within 15 days from the end of the quarter to Stock Exchange.	74(5) of SEBI (Depositories and Participants) Regulations 2018	The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018.			The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018. For Quarter ended 1. June 2023 - 22.07.2023 (Delay) 2. Sept 2023 - 12.10.2023 (Within Time) 3. Dec 2023 - 23.01.2024 (Delay) 4. March 2024 - Filed on 19.04.2024 (Delay)	The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018. For Quarter ended 1. June 2023 - 22.07.2023 (Delay) 2. Sept 2023 - 12.10.2023 (Within Time) 3. Dec 2023 - 23.01.2024 (Delay) 4. March 2024 - Filed on 19.04.2024 (Delay)	Upon identification of the delayed filing, the Company has taken the following corrective actions 1. Compliance Calendar Revised 2. RTA Coordination Strengthened	It is observed that the Company delayed the submission of the Compliance Certificate as required under Regulation 74(5) for one or more quarters during the previous financial year.



E. I 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*
1.	<p>Secretarial Standards:</p> <p>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.</p>	YES	The Listed entity has complied 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.
2.	<p>Adoption and timely updation of the Policies:</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 entities ● All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	YES	The Listed entity has Adopted and updated the policies applicable under SEBI Regulations.
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● 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	The Listed entity has Maintained functional and updated website.
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	YES	None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	There are no subsidiaries to listed entity.



6.	<p>Preservation of Documents:</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	The listed entity has maintained and preserved 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.
7.	<p>Performance Evaluation:</p> <p>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.</p>	YES	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.
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	NO	The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.
9.	<p>Disclosure of events or information:</p> <p>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.</p>	YES	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.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	The Company has maintained structured digital database as per the requirement of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>Following action(s) has been 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 except as</p>	NO	The Company has received email intimation that the Company has not submitted various Quarterly compliance report for the quarter ended March 2025.



	provided underseparate paragraph herein (**). 1. The Company has received email intimation that the Company has not submitted various Quarterly compliance report for the quarter ended March 2025.		
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.	YES	No statutory auditor has resigned during the reporting period.
13.	Additional Non-compliances, if any: **additional non compliances list is given below in point E of this report.		

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 the 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 S D Kolhe and Company.
Company Secretaries**

Satish D. Kolhe



**Satish D Kolhe
Proprietor
ICSI Membership No: A61229
CP No: 23879
UDIN: A061229G000461915
Peer Review No: 5571/2024
Date: 27th May 2025.
Place: Pune**