BANDARAM

To,

Date: 28.05.2025

The Manager
BSE Limited
P. J. Towers, Dalal Street
Mumbai-400001
(BSE Scrip Code: 523796)

Dear Sir/Madam,

Unit: Bandaram Pharma Packtech Limited (BSE Scrip Code: 524602)

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

With reference to the subject cited, please find the enclosed Annual Secretarial Compliance Report pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31.03.2025.

This is for your information and records, please.

Thanking you.

Yours Faithfully,
For Bandaram Pharma Packtech Limited

B Deepak Reddy Digitally signed by B Deepak Reddy

B. Deepak Reddy
Managing Director
DIN: 07074102

Encl: a/a

SECRETARIAL COMPLIANCE REPORT OF BANDARAM PHARMA PACKTECH LIMITED FOR THE YEAR ENDED 31.03.2025

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **BANDARAM PHARMA PACKTECH LIMITED** (CIN: L93090KA1993PLC159827) (hereinafter referred as 'the listed entity'), having its Registered Office at 601,5th Floor, Oxford Towers, Opp to Leela Palace Hotel, Old Airport Road, Kodihalli, Bangalore - 560008, Karnataka. 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, forms and returns etc., and also the information provided by the listed entity, we hereby report the compliance status of the listed entity during the review period covering the financial year ended on 31st March, 2025 as mentioned below:

We, **Manoj Parakh & Associates**, Practicing Company Secretaries have examined:

(a) all the documents and records made available to us and explanation provided by **BANDARAM PHARMA PACKTECH LIMITED** ("the listed entity"),

(b) the filings/ submissions made by the listed entity to the stock exchange (BSE Limited),

(c) website of the listed entity,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this Report.

for the financial year ended 31st 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;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable during the year under review.**

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;**Not Applicable during the year under review.**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the year under review.**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible) Regulations, 2021; **Not Applicable during the year under review.**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

(h) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.

and circulars/ guidelines issued thereunder;

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

(a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued there under wherever applicable, 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	Filing of Related party transaction on the same day of the Results	Reg 23(9) of SEBI LODR Regulations	Non-compliance with disclosure of related party transactions on consolidated basis. for the quarter ended 31.03.2024.	BSE	Fine	Filing of RPT with delay	Rs. 5,000/- plus GST	The Company tried to file the related party transaction for the half year ended 31.03.2024 on the same day after filing the results but due to technical glitch the report could not be filed on the same day. The Company has immediately mailed to BSE the screenshot of error on the same day. The same was resolved by BSE the next day and the Company has immediately filed the RPT XBRL on the next day i.e., on 30.05.2024.	Fine has been paid by the Company on 17.07.2024.	The Company has filed the XBRL on 30.05.2024

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(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 the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2024	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of Violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Corporate Governance was not applicable to Bandaram Pharama Packtech Limited for the quarter ended 30.09.2023 Due to the increase in paid up capital, the Company has triggered the applicability of Corporate Governance w.e.f. 27.07.2023. Further, as per the above said provisions, the Company must ensure Corporate Governance Compliances within Six	The Company has appointed Ms. Priyanka Agarwal as an Additional Director (Independent Category) of the Company w.e.f. 17.10.2023.	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	Chairperson of Board of Bandaram Pharma Packtech Ltd is not a non-executive director and the number of independent directors is less than half of the BoD strength.	The Company has appointed Ms. Priyanka Agarwal as an Additional Director (Independent Category) of the Company w.e.f. 17.10.2023.	Fines for the aforesaid Regulation has been withdrawn by BSE vide its email dated 25.04.2024.

	months (i.e. from the date of applicability) i.e., on or before 26.01.2024.					

I. 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*
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).	Yes	Nil
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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI	Yes Yes	Nil Nil
3.	**Maintenance and disclosures on Website:** • 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	Nil
4.	**Disqualification of Director (s):** None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil

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5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** a) Identification of material subsidiary companies b) Disclosure requirement 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 as per Policy of Preservation of Documents and Archival policy prescribed under LODR Regulations.	Yes	Nil
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:** a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified /rejected by the Audit committee.	Yes NA	Nil The listed entity has obtained prior approval of 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) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Nil
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	mentioned in the table given above under point (a)

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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	There was no appointment/ reappointment/ resignation of Statutory auditor in the listed entity / or its material subsidiary(ies) during the review period.
13.	**No additional non-compliances observed:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	Nil

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. **Not applicable**

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.
5. This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied with by the Company up to the date of this Report pertaining to the financial year ended March' 2025.
6. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on random test basis.

7. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.

For Manoj Parakh & Associates

26/5/25

Manoj Parakh
Proprietor
M.No.F8572, C.P.No.8957
UDIN: F008572G000438496
PR: 3439/2023
FRN: S2016AP416000

Place: Visakhapatnam
Date: 26.05.2025