Gokul Refoils & Solvent Ltd.
Corporate Office:
501, Fifth Floor, Block A, Gokul Pratham, Near Tapovan Circle, T.P. 44, Chandkheda, Ahmedabad - 382424, Gujarat, India. **Phone:** +91-79-35015555
CIN: L15142GJ1992PLC018745

May 07, 2026

To BSE Ltd. 25th Floor, Phiroze Jeejeebhoy Tower, Mumbai – 400 001 Company Code 532980	To, National Stock Exchange of India Ltd. Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (E) Mumbai - 400 051 Company Code GOKUL

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended March 31, 2026
Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s. Agrawal & Mehta Company Secretaries LLP, Ahmedabad, for the financial year ended March 31, 2026.

Kindly take the same on your record.

Thanking You

Yours truly,
For, Gokul Refoils & Solvent Ltd.

NIKHILKUMAR MANSUKHBHAI VADERA
Digitally signed by NIKHILKUMAR MANSUKHBHAI VADERA
Date: 2026.05.07 17:48:49 +05'30'

Nikhilkumar Vadera
Company Secretary & Compliance Officer

ANNUAL SECRETARIAL COMPLIANCE REPORT OF GOKUL REFOILS AND SOLVENT LIMITED (CIN: L15142GJ1992PLC018745) FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2026

We, M/s. AGARWAL & MEHTA COMPANY SECRETARIES LLP, have examined:

1) all the documents and records made available to us and explanation provided by **GOKUL REFOILS AND SOLVENT LIMITED** — CIN: L15142GJ1992PLC018745 ("the listed entity"),

2) the filings/ submissions made by the listed entity to the stock exchanges,

3) website of the listed entity,

4) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the financial year ended 31.03.2026 ("period under review") in respect of compliance with the provisions of:

i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued thereunder; and

ii) 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 for the period under review, have been examined, and 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,

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;

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

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

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

h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

However, regulations mentioned above under clause (b), (d), (e) & (f) are not subject to the Examination as no activities were carried under the said regulations during the period under review and based on the examination of documents/information received electronically, we hereby report that, during the period under review;

a) 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	Observation /Remarks of the PCS	Management Response	Remarks
NIL										

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

Sr No	*Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)*	*Observations made in the Secretarial Compliance report for the year ended on 31.03.2025*	*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*
NIL						

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

Sr. No.	Particulars	Compliance Status (Yes/No/N.A.)	Observation/ 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	-
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 & updated on time as per the regulations/ circulars/ guidelines issued by SEBI	Yes	-
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	-
4	Disqualification of Directors: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	-
5	Details related to Subsidiaries of listed entities have been examined w.r.t.:	Yes	-

	a) Identification of material subsidiary companies b) Disclosure requirements of material as well as other subsidiaries		
6	<u>Preservation of Documents:</u> 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	-
7	<u>Performance Evaluation:</u> 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	-
8	<u>Related Party Transactions:</u> a) The listed entity has obtained prior approval of Audit Committee for all the 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.	a) Yes b) N.A	Since, all Related Party transaction were entered after obtaining approval of audit committee point (b) is not applicable
9	<u>Disclosure of events or information:</u> 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	-

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	-
11	Actions taken by SEBI or Stock Exchange(s), if any: No Actions have 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.	Yes	As informed by the management, no actions were taken against the listed entity /its promoters/directors / subsidiaries either by SEBI or by BSE & NSE under SEBI Regulations and circulars/guidelines issued there under during period under review.
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 has been no resignation of Statutory Auditors from the Listed Entity during period under review.
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note, etc.	NA	No additional Non-Compliances have been observed during period under review.

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

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.

For, Agarwal & Mehta Company Secretaries LLP
ICSI Unique Code No. : L2018GJ004600

Mehta Yash Hineshkumar
Digitally signed by Mehta Yash Hineshkumar
Date: 2026.05.06 18:33:36 +05'30'

Yash Mehta
Partner
FCS No.: 12143 C. P. No.: 16535
UDIN: F012143H000295503
Peer Review No. : 6717/2025

Date : 06.05.2026
Place : Ahmedabad