Phone No.: 30767700

THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LIMITED

CIN: L65190MH1940PLC003151
Regd. Office: 4th Floor, Piramal Tower Annexe, Ganpatrao Kadam Marg, Lower Parel, Mumbai - 400 013
E: complianceofficer.swastik@piramal.com **W:** www.theswastiksafedeposit.in

May 21, 2025

The Secretary,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Fort, Mumbai - 400 001

Dear Sir,

Scrip Code: BSE: 501386

Sub.: Annual Secretarial Compliance Report u/r 24(A) of SEBI LODR Regulations, 2015

Please find enclosed herewith the Annual Secretarial Compliance Report dated May 12, 2025 of M/S. V K Bhanushali & Co, Practicing Company Secretaries as required under Regulation 24(A) of SEBI LODR Regulations, 2015 for the financial year ended 31st March, 2025.

Kindly acknowledge the receipt.

Thanking you,
Yours faithfully,
For **The Swastik Safe Deposit and Investments Limited**

JITESH KUMAR AGARWAL

Digitally signed by JITESH KUMAR AGARWAL
Date: 2025.05.21 11:12:13 +05'30'

Jitesh K. Agarwal
Company Secretary

FCS - 6890

Encl: a/a

V K Bhanushali & Co.
Practicing Company Secretaries

To,
The Board of Directors,
THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD
4th Floor, Piramal Tower Annexe,
Ganpatrao Kadam Marg, Lower Parel,
Mumbai City, Maharashtra, India, 400013

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the financial year 2024-25

We have been engaged by **THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD**, (hereinafter referred to as "the Company") bearing CIN: **L65190MH1940PLC003151**, whose equity shares are listed on BSE Limited & Delhi Stock Exchange to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI Listing Regulations"), read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 along with BSE & NSE vide Notice no. 20230316-14 aod 20230410-41 & Circular Reference No. NSE/CML/2023/21 and NSE/CML/2023/30 dated March 16, 2023 & April 10, 2023, respectively, to issue Annual Secretarial Compliance Report and the additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable regulations, circulars and guidelines issued by the Securities and Exchange Board of India (SEBI) from time to time, and to ensure that the systems are adequate and effective.

Our responsibility is to verify compliances by the Company with provisions of all applicable regulations, circulars and guidelines issued hy SEBI from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI) and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. The Annual Secretarial Compliance Report is enclosed as Annexure.

FOR V K BHANUSHALI & CO.
PRACTISING COMPANY SECRETARIES
UIN: S2023MH945600
P/R NO. 4614/2023

VK Bhanushali & Co. CS

VINIT BHANUSHALI
PROPRIETOR
ACS: 62720
COP NO.: 26886
UDIN: A062720G000322859

DATE: MAY 12, 2025
PLACE: MUMBAI

Address: Rajhans Helix 3, 808, 8th Floor, L.B.S Marg, Ghatkopar West, Mumbai-400086.
Phone No.: +91 7977012165 | **Email:** csvinitbhanushali@gmail.com

V K Bhanushali & Co.
Practicing Company Secretaries

Secretarial Compliance Report of The Swastik Safe Deposit And Investments Ltd (for the year ended March 31, 2025)

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **The Swastik Safe Deposit And Investments Ltd**_(hereinafter referred as 'the listed entity'), having its Registered Office at 4th Floor, Piramal Tower Annexe, Ganpatrao Kadam Marg, Lower Parel, Mumbai City, MUMBAI, Maharashtra, India, 400013. 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, disclosures 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 March 31, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter

We, V K BHANUSHALI & CO, Practicing Company Secretaries have examined:

a) All the documents and records made available to us and explanation provided by **The Swastik Safe Deposit And Investments Ltd ("the Company");**

b) The filings/ submissions made by the Company to the stock exchanges;

c) Website of the Company;

d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification for the period from April 01, 2024 to March 31, 2025 ('Review Period'), in respect of compliance with the provisions of:

   i. The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder.

   ii. The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars and guidelines issued thereunder, to the extent applicable to the Company:

The Specific regulations, whose provisions and the circular/ guidelines issued thereunder, have been examined are:

- The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

Address: Rajhans Helix 3, 808, 8th Floor, L.B.S Marg, Ghatkopar West, Mumbai-400086.
Phone No.: +91 7977012165 | **Email:** csvinitbhanushali@gmail.com

- The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- The Securities and Exchange Board of India (Registrar to an Issue and Share transfer Agents) Regulations, 1993; regarding the Companies Act, 2013 and dealing with the client.
- The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable to the Company, for the period under review).**

And based on the above examination, 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)	Observation / Remarks by PCS
1.	**Secretarial Standards:** The compliances of listed entities are in accordance with the Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	The Company has duly complied with the SS issued by ICSI.
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	The Company has updated all applicable policies under SEBI Regulations and the same are in conformity with SEBI Regulations and has been reviewed.
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 redirects to the relevant document(s) / section of the website.	Yes	The Company is maintaining fully functional website https://www.theswastiksafedeposit.in/ for these compliances
4.	**Disqualification of Director:** None of the Director of the Company are disqualified under Section 164 of Companies	Yes	None of the Director of the Company are disqualified under

Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observation / Remarks by PCS
	Act, 2013.		Section 164 of Companies Act, 2013.
5.	**To examine details related to Subsidiaries of listed entities:** a) Identification of material subsidiary companies. b) Requirements with respect to disclosure of material as well as other subsidiaries.	Yes	The Company does not have any Material / other Subsidiary.
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	The Company has complied with the SEBI Regulations for preserving and maintaining records as prescribed and has duly in place the said policy.
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	The Company has duly conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year.
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	The Company has obtained prior approval of Audit Committee for all Related party transactions
9.	**Disclosure of events or information:** The listed entity has provided all the required disclosure(s) under Regulation 30	Yes	The Company has provided all the required

Bhanushali & Co. CS

Sr. No.	Particulars	Compliance status (Yes/ No/ NA)	Observation / Remarks by PCS
	along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.		disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.
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	The Company has duly complied with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No Actions 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 there under.	Yes	The Company is not in receipt of any such notices from SEBI or Stock exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under.
12.	**Additional Non-compliances, if any:** No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	NA

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019

V K Bhanushali & Co.

V K Bhanushali & Co.
Practicing Company Secretaries

Sr. No.	Particulars	Compliance status (Yes/No/ NA)	Observation / Remarks by PCS
1.	**Compliances with the following conditions while appointing/ re-appointing auditor**		
	i. if the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or **ii.** If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or **iii.** If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	There is no instance of resignation of statutory auditors from the Company
2.	**Other Conditions relating to resignation of Statutory Auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: **a.** In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. **b.** In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit	NA	There is no instance of resignation of statutory auditors from the Company. Hence, disclosures in such respect are not applicable to the Company for the period under

V K Bhanushali & Co.
Practicing Company Secretaries

Sr. No.	Particulars	Compliance status (Yes/No/ NA)	Observation / Remarks by PCS
	Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable. c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor. ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		review.
3.	**Obligations of the listed entity and its material subsidiary**		
	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	NA	There is no instance of resignation of statutory auditors in the Company. Hence, disclosures in such respect are not applicable to the Company for the period under review.

a) The Company has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

VK Bhanushali & Co. CS

V K Bhanushali & Co.
Practicing Company Secretaries

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/ Circular No.	Deviations taken	Action by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of violation	Fine Amount	Observations/ remarks of the Practising Company Secretary, if any.	Management Response	Remarks
NOT APPLICABLE										

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

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action taken by	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of violation	Fine Amount	Observations/ remarks of the Practising Company Secretary, if any.	Management Response	Remarks
1.	SEBI (LODR) Regulations, 2015	Reg. 23(9)	Non-Filing	BSE Limited	Show Cause Notice	Non-Compliance Related Party Transactions for the half year ended March 31, 2021.	2,36,000 (Including GST)	The Company has duly replied to such SCN and has paid the fine.	Application of Waiver was filed with BSE limited	Penalty was waived off to the extent of Rs. 48,20,000/-

V K Bhanushali & Co.
Practicing Company Secretaries

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.

FOR V K BHANUSHALI & CO.
PRACTISING COMPANY SECRETARIES
UIN: S2023MH945600
P/R NO. 4614/2023

VK Bhanushali & Co. CS

VINIT BHANUSHALI
PROPRIETOR
ACS: 62720
COP NO.: 26886
UDIN: A062720G000322859

DATE: MAY 12, 2025
PLACE: MUMBAI.