SHREE SECURITIES LIMITED

Registered Office: Office No. 427, Rangoli Forum Mall, 212,
Girish Ghosh Road, Belur, Howrah- 711202, West Bengal, India
CIN: L65929WB1994PLC061930
Contact No: 9924703879; **Email ID:** authorised.ssl@gmail.com;
Website: www.shree-securities.com

Date: 30th May, 2026

To,
The General Manager,
Corporate Relationship Department,
BSE Limited,
Phiroz Jeejeebhoy Tower,
Dalal Street, Mumbai — 400001,
Maharashtra, India

To,
The Calcutta Stock Exchange Limited
7 Lyons Range
Kolkata- 700001

Reference (BSE): ISIN - INE397C01026; Scrip Code- 538975; Symbol- SHREESEC
CSE Scrip code: 10029469

Subject: Submission of Annual Secretarial Compliance Report under Regulation 24A of Securities and Exchange Board of India (Listing obligations and Disclosure Requirement) Regulations, 2015 for the year ended 31st March, 2026

Dear Sir/Ma'am,

With reference to the above-mentioned subject and pursuant to Regulation 24A of Securities and Exchange Board of India (Listing obligations and Disclosure Requirement) Regulations, 2015 we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2026.

You are requested to please take the same in your record,

Thanking you
Yours Faithfully

FOR SHREE SECURITIES LIMITED

Bhavya Dhiman
Digitally signed by Bhavya Dhiman
Date: 2026.05.30 17:14:53 +05'30'

BHAVYA DHIMAN
MANAGING DIRECTOR & CEO
DIN- 09542964

VISHAKHA AGRAWAL & ASSOCIATES

Practising Company Secretaries
301-G, Goyal Vihar, Gate No. 2
Khajrana Road, Indore (M.P.)
Email: csvishakhagrawal@gmail.com
Contact No. 9424501155, 8518888114

SECRETARIAL COMPLIANCE REPORT
OF SHREE SECURITIES LIMITED
(CIN: L65929WB1994PLC061930)

FOR THE FINANCIAL YEAR ENDED 31ST MARCH 2026

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors
SHREE SECURITIES LIMITED
CIN: L65929WB1994PLC061930
3, Synagogue Street 3rd Floor Room No 18G,
Kolkata (W.B.) - 700001

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SHREE SECURITIES LIMITED** (CIN: L65929WB1994PLC061930) (hereinafter referred as 'the listed entity'), having its Registered Office at 3, Synagogue Street 3rd Floor Room No 18G, Kolkata (W.B.) **-** 700001. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion 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 in our opinion, the listed entity has, during the review period covering the financial year ended on **March 31, 2026**, *generally* complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter.

We have examined:

(a) All the documents and records made available to us and explanation provided by **SHREE SECURITIES LIMITED** (CIN: L65929WB1994PLC061930) (“the listed entity”),

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

(c) the website of the listed entity, i.e. **www.shreesecindia.com**,

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

for the financial year ended **31st March 2026** (“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, includes:-

(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; **(Not applicable to the Company during the Review Period)**

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the Review Period)**

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible) Regulations, 2021; **(Not applicable to the Company during the Review Period)**

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

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **(Not applicable to the Company during the Review Period)**

and circulars/ guidelines issued thereunder;

Wherever required, we have obtained the management representation about the compliance of the laws, rules, regulations and happening of events, etc.

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 thereunder except in respect of matters specified below:-

S. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause	Regulation/ Circular No.	Actions taken by the Authority	Type of Action	Details of Violations	Fine Amount	Observations/ Remarks of the Practising Company Secretary	Management Response
1	Regulation 13(3) of SEBI (LODR) Regulations, 2015 Submission of Statement of Investor Complaints	Regulation 13(3) of SEBI (LODR) Regulations, 2015	BSE	Fine	Non-submission of Statement of Investor Complaints for the quarter ended September 2025 (138 days)	Rs. 1,38,000	The Company was advised to pay the fine amount and comply with the said regulation.	The Company has assured to timely comply with the provisions in future.

2	Regulation 13(3) of SEBI (LODR) Regulations, 2015 Submission of Statement of Investor Complaints	Regulation 13(3) of SEBI (LODR) Regulations, 2015	BSE	Fine	Non-submission of Statement of Investor Complaints for the quarter ended December 2025 (44 days)	Rs. 44,000	The Company was advised to pay the fine amount and comply with the said regulation.	The Company has assured to timely comply with the provisions in future.
3	Regulation 27(2) of SEBI (LODR) Regulations, 2015 Quarterly Compliance Report on Corporate Governance	Regulation 27(2) of SEBI (LODR) Regulations, 2015	BSE	Fine	Non-Submission of Quarterly Compliance Report on Corporate Governance for quarter ended Sep 2025 (Delay-138 days)	Rs. 276,000	The Company was advised to pay the fine amount and comply with the said regulation.	The Company has assured to timely comply with the provisions in future.
4	Regulation 27(2) of SEBI (LODR) Regulations, 2015 Quarterly Compliance Report on Corporate Governance	Regulation 27(2) of SEBI (LODR) Regulations, 2015	BSE	Fine	Non-Submission of Quarterly Compliance Report on Corporate Governance for quarter ended Dec 2025 (Delay-44 days)	Rs. 88,000	The Company was advised to pay the fine amount and comply with the said regulation.	The Company has assured to timely comply with the provisions in future.
5	Regulation 31 of SEBI (LODR) Regulations, 2015 Submission of Shareholding pattern	Regulation 31 of the SEBI (LODR) Regulations, 2015	BSE	Fine	Delay of 145 days in submission of shareholding pattern for the quarter ended September 2025	Rs. 2,90,000	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
6	Regulation 31 of SEBI (LODR) Regulations, 2015 Submission of Shareholding pattern	Regulation 31 of the SEBI (LODR) Regulations, 2015	BSE	Fine	Delay of 55 days in submission of shareholding pattern for the quarter ended September 2025	Rs. 1,10,000	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
7	Regulation 33 of SEBI (LODR) Regulations, 2015 Submission of the financial results within the period prescribed under this regulation	Regulation 33 of SEBI (LODR) Regulations, 2015	BSE	Fine	Late submission of financial results for the quarter ended June 2025 by 205 days	Rs. 1025,000	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
8	Regulation 33 of SEBI (LODR)	Regulation 33 of SEBI	BSE	Fine	Late submission of financial	Rs. 5,70,000	The Company was advised to be more	The delay was non-intentional and

	Regulations, 2015 Submission of the financial results within the period prescribed under this regulation	(LODR) Regulations, 2015			results for the quarter ended Sept 2025 by 114 days		careful to timely comply with the regulations.	further, the Company has assured to timely comply with the regulations in future.
9	Regulation 33 of SEBI (LODR) Regulations, 2015 Submission of the financial results within the period prescribed under this regulation	Regulation 33 of SEBI (LODR) Regulations, 2015	BSE	Fine	Late submission of financial results for the quarter ended December 2025 by 22 days	Rs. 1,10,000	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
10	Regulation 34 of SEBI (LODR) Regulations, 2015 Late Submission of Annual Report	Regulation 34 of SEBI (LODR) Regulations, 2015	BSE	Fine	Late submission of Annual Report of financial year ended March 2025 by 190 days	Rs. 3,80,000	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
11	Regulation 6(1) of SEBI(LODR) Regulations, 2015 Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	Regulation 6(1) of SEBI(LODR) Regulations, 2015	BSE	Fine	Failure to appoint a qualified Company secretary as the Compliance Officer of the Company for the quarter ended March 2026	Rs. 90,000	The company was advised to pay the fines imposed and to comply with the applicable regulation.	The Non-compliance was due to failure to find a suitable and qualified candidate for the post of Compliance officer of Company. However, the Company has paid the fines imposed.
12	Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015 Delay in furnishing prior intimation about the meeting of the board of directors	Regulation 29(2)/29(3) of SEBI (LODR) Regulations, 2015	BSE	Fine	Delay in prior intimation about meeting of Board of directors in March 2026.	Rs. 10,000	The company was advised to pay the fines imposed and to comply with the applicable regulation.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.
13	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018 Non-submission of Reconciliation of share Capital audit Report	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018	BSE	-	Delay in submission of reconciliation of Share Capital Audit report for the quarter ended Sep 2025	-	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.

14	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018 Non-submission of Reconciliation of share Capital audit Report	Regulation 76 of SEBI (Depositories & Participants) Regulation 2018	BSE	-	Delay in submission of reconciliation of Share Capital Audit report for the quarter ended Dec 2025	-	The Company was advised to be more careful to timely comply with the regulations.	The delay was non-intentional and further, the Company has assured to timely comply with the regulations in future.

(b) The listed entity 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	Observations/ Remarks of the Practising Company Secretary	Management Response
1	Reg 23(9) – Related Party disclosure for the period ending September 2023	Regulation 23(9) of SEBI (LODR) Regulations 2015	Delay in submission of Related Party disclosure for the period ending September 2023	The management has paid penalty amounting Rs. 5000 plus GST.	The management has paid penalty amounting Rs. 5000 plus GST.
2	Regulation 31 of SEBI (LODR) Regulations, 2015 Submission of Shareholding pattern	Regulation 31 of the SEBI (LODR) Regulations, 2015	Delay in submission of Shareholding pattern for the period ending June 2023	Penalty amount paid in full	The management has paid penalty amounting Rs. 108,000 plus GST.
3	Regulation 17(1)- Non-Compliance in Composition of Board of Directors for the period ending September 2022	Regulation 17(1) of SEBI (LODR) Regulations 2015	Penalty of Rs. 4,60,000/- levied by Exchange towards Non-compliance in Composition of Board of Directors under Regulation 17(1) for the quarter ended September, 2022	Penalty amount paid in full	The management has paid penalty amounting Rs. 4,60,000 plus GST.
4	Regulation 17(1)- Non-Compliance in Composition of Board of Directors for the period ending December 2022	Regulation 17(1) of SEBI (LODR) Regulations 2015	Penalty of Rs. 2,70,000/- levied by Exchange towards Non-compliance in Composition of Board of Directors under Regulation 17(1) for the quarter ended December, 2022	Penalty amount paid in full	The management has paid penalty amounting Rs. 2,70,000 plus GST.

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

S.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 of 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes 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) of Listing Regulations are accurate and specific which re-directs to the relevant document(s) /section of the website.	Yes Yes Yes	
4.	**Disqualification of Director:** 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	
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	N.A.	The Company does not have any 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	

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	
8.	**Related Party Transactions:** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or 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.	Yes N.A.	It was observed that the prior approval of audit committee was taken, wherever required.
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	
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 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. The actions taken against the listing entity / its promoters / directors / subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	No action taken during the review period.
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.	N.A.	There is no instance of resignation of statutory auditor during the period under review.
13.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

* Observations / Remarks by PCS are mandatory if the Compliance status is provided as ‘No’ or ‘NA’

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 Vishakha Agrawal & Associates
Practising Company Secretaries

VISHAKHA AGRAWAL
Digitally signed by VISHAKHA AGRAWAL
Date: 2026.05.30 00:31:55 +05'30'

CS Vishakha Agrawal
(Proprietor)
ACS: 39298 CP No. 15088
P.R. No. 2575/2022
UDIN: A039298H000547179

Place: Indore
Date: 30/05/2026