



Secretarial Compliance Report

Of

EKI Energy Services Limited

for the financial year ended March 31, 2024

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **EKI Energy Services Limited** (hereinafter referred as '**the listed entity**'), having its Registered Office at 201, Plot No. 48., Scheme No. 78, Part-II, Vijay Nagar (Near Brilliant Convention Centre), Indore, Madhya Pradesh, 452010. 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 and returns filed and other records maintained by the listed entity on test basis 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, 2024 ('**Review Period**') complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We have examined:

- all the documents and records made available to us and explanation provided by the **EKI Energy Services Limited**,
- the filings/ submissions made by the listed entity to the stock exchange,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this report,

for the financial year ended 31st March 2024 Review Period in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, circulars, guidelines issued there under; and
- 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:-

- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**") as amended;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable to the Company during the review period**;
- SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended;



- (d) SEBI (Buyback of Securities) Regulations, 2018; **Not Applicable to the Company during the review period;**
- (e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 as amended;
- (f) SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended;
- (g) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable to the Company during the review period;**
- (h) SEBI (Depositories & Participants) Regulations, 2018; and
- (i) Other regulation as applicable

and circulars/ guidelines issued thereunder;

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

- a) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/ Guidelines issued thereunder in so far as it appears from my/our examination of those records.
- b) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters Specified **Annexure - A** to the report.
- c) The listed entity has taken the following actions to comply with the observations made in previous reports as appended as **Annexure - B** to the report.
- d) The listed entity has complied with the provisions of Para 6 of Circular No. CIR/ CFD/ CMD1/114/2019 issued by SEBI on 18th October, 2019 in terms of appointment of Statutory Auditors / Resignation of Statutory Auditors of Listed Entity; During the reporting Period, the Company has Passed Special Resolution dated 06th September, 2023 for appointment of M/s. Dassani & Associates, Chartered Accountants (Firm Registration no. 009096C) as a Joint Statutory Auditors of the Company. At the Annual General Meeting dated 27th October, 2023, the Company has appointed M/s. Dassani & Associates, Chartered Accountants for a period of 5 (Five) years.
- e) In terms of the NSE Circular Ref No: NSE/CML/2023/30 dated 10th April, 2023 and the BSE Circular No: 20230410-41 dated 10th April, 2023, and amendments therein, our affirmations, 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), as notified by the Central Government under section 118 (10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None



2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity. All the policies are in conformity with SEBI Regulations and has been reviewed & updated as per the regulations /circulars /guidelines issued by SEBI. 	Yes Yes	None
3	Maintenance and disclosure on website: <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 redirects to the relevant document(s)/ section of the website. 	Yes Yes Yes	None
4	Disqualification of Directors: None of the Directors of the Company are disqualified under section 164 of the Companies Act, 2013, as confirmed by the listed entity.	Yes	We have verified the same basis the declarations furnished by Directors.
5	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none"> a. Identification of material subsidiary companies b. Disclosure requirement of material as well as other subsidiaries. 	Yes Yes	GHG Reduction Private Limited become the Unlisted Material Subsidiary of EKI Energy Services Limited during the reporting Period.

Ruchi Joshi



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 the Listing Regulations.	Yes	None
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	None
8	Related Party Transactions ('RPTs'): a. The listed entity has obtained prior approval of Audit Committee for all RPTs; 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 Yes	None
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of Listing Regulations within the time limits prescribed thereunder.	Yes	None
10	Prohibition of Insider Trading: The listed entity is in compliance with the Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None




RUCHI JOSHI MERATIA
Practicing Company Secretary
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9827433225



**Ruchi Joshi Meratia
& Associates**

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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 the Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein.	Yes	As informed by the Compliance officer and CFO of the Company, there is no such Action taken by the SEBI or Stock exchange(s).
12	Additional Non-Compliances, if any: No additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	No	None

Date: 11.05.2024
Place: Indore



For Ruchi Joshi Meratia & Associates.
Practicing Company Secretaries

Ruchi Joshi
Ruchi Joshi Meratia
CP: 14971 | FCS: 8570
UDIN: F008570F000353684
PR No. 2022/2025



Annexure-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 in Rs.	Observations / remark of thePCS	Management response	Remarks
1	33	Regulation 33 (3) (d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has filed delayed Submission of Financial results under regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for quarter and year ended March 31, 2023	BSE	Fine	Late Submission of Financial results	6,95,000	The Company has not Filed Financial results for quarter and year ended March 31, 2023 within the Stimulate timeline.	The Company has filled financial results for quarter and year ended March 31, 2023 on September 23, 2023. Also, the Company has duly paid the fine levied by BSELTD.	
2	33	Regulation 33 (3) (d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has filed delayed Submission of Financial results under regulation 33 of SEBI (Listing Obligations and	BSE	Fine	Late Submission of Financial results	1,95,000	The Company has not Filed Financial results for quarter ended June 30, 2023 within the Stimulate timeline.	The Company has filled financial results for quarter ended June 30, 2023 on September 23, 2023. Also, the	

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Ruchi Joshi Meratia & Associates
Practicing Company Secretary
C.S.8570 | CP.14971



			Disclosure Requirements) Regulations, 2015, for quarter ended June 30, 2023.						Company has duly paid the fine levied by BSELTD.
3	23	Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has filed delayed Submission of related party transactions under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, for half year ended March 31, 2023	BSE	Fine	Late Submission of related party transactions	NA	The Company has not Filed related party transactions for half year ended March 31, 2023 within the Stimulate timeline.	The Company has filled Related Party Transactions for half Year ended March 31, 2023 on September 23, 2023

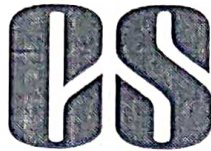
Annexure-B

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 in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March ,2023	Compliance Requirements (Regulation/ Circulars/Guidelines including specific Clause)	Details of Violation/ Deviations and action taken/penalty imposed if any, on the listed entity	Remedial actions, if any taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Where a listed entity does not have a regular non-	Where a listed entity does not have a regular non-	Regulation 17 (1) (b) of the Listing	Mr. Manish Dabkara, the chairman of	The Company has appointed Independent	No further Comments are

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	<p>executive chairperson, at least half of the board of directors shall comprise of independent directors</p>	<p>executive chairperson, at least half of the board of directors shall comprise of independent directors</p>	<p>Regulations</p>	<p>the Company is a promoter director. For the quarter ended September 2022 and upto November 11, 2022, the Company had 7 directors on its board out of which 3 were independent directors. As per the requirements of reg. 17 (1) (b) the Company was required to have 4 independent directors on the board.</p> <p>The Fine Imposed by the BSE is Rs. 5,42,800 and 2,41,900 on the listed entity.</p>	<p>Director and Constitute Proper Board as per Listing Regulations on November 11, 2022. Since then, the Company has 6 Directors and Composition as per Regulation 17 (1) (b) of the Listing Regulations.</p>	<p>required as the remarks is self-explanatory .</p>
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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 financial Records and Books of Accountsof the listed entity.



RUCHI JOSHI MERATIA

Practicing Company Secretary

B.COM, FCS

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**Ruchi Joshi Meratia
& Associates**

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4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations 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 Ruchi Joshi Meratia & Associates.
Practicing Company Secretaries**



Ruchi Joshi Meratia

CP: 14971 | FCS: 8570

UDIN: F008570F000353684

PR No. 2022/2025

Date: 11.05.2024

Place: Indore