### SUPERTEX INDUSTRIES LIMITED

#### An ISO 9001:2015 Certified Company

HEAD OFFICE: BALKRISHNA KRUPA, 2ND FLOOR, 45/49, BABU GENU ROAD, PRINCESS STREET,

MUMBAI - 400 002

TEL.: 91-22-22095630 / 31, 22069034

EMAIL: info@supertex.in • WEBSITE: www.supertex.in

CIN.: L99999DN1986PLC000046



Date: 30th May, 2024

To,
Bombay Stock Exchange Limited
Department of Corporate Service
P.J. Towers,
Dalal Street, Fort,
Mumbai – 400 001.

Scrip Code: 526133

Sub: <u>Submission of Annual Secretarial Compliance Report under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 for the financial year ended 31<sup>st</sup> March, 2024</u>

Dear Sir/ Madam

In terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March, 2024 issued by M/s Vikas R. Chomal & Associates, Practicing Company Secretaries.

Kindly take the same on your records.

Thanking you

Yours faithfully

For Supertex Industries Limited

SANJAY KUMAR MISHRA Digitally signed by SANJAY KUIMAR MISHRA MISHRA MISHRA Dic c-INL, o-Personal, title-1919, pseudonym-13354282006606218656647 REZ75969, 25.4.20-031ffc038599462788a8923026649 25.4.20-031ffc038599462788a8923026649 25.4.20-031fc038599462784620736241338575c46fd132b, potlat Code-600026, s1-4Mahrashtra, serialhumber-eff-279757382554945642424 624202620650f69311657963 1a 1a 78768a27 624202626767693477 MIDARA MISHRA

Sanjay Kumar Mishra Director and CFO DIN: 00304796

Encl: As above

# VIKAS R CHOMAL AND ASSOCIATES PRACTICING COMPANY SECRETARIES

**Head office:** A/B-201, 2<sup>nd</sup> Floor, Manas Bldg, Khakar Alley, Thane West, Thane - 400601 **Branch office:** C/o. Dalal Desai & Kumana, Chartered Accountants, Union Co. op Insurance

Bldg., 2nd Floor, 23, P M Road, Fort, Mumbai – 400001.

Email: csvrca@gmail.com/vikas@vrca.co.in, Phone: 022-25410931/9867811641

## Secretarial Compliance Report of The Supertex Industries Limited for the financial year ended 31<sup>st</sup> March 2024

To,
The Board of Directors,
Supertex Industires Limited
Plot no 45/46, Piperia Industrial estate,
Phase-II, Silvassa DN 396230

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Supertex Industries Limited (hereinafter referred as 'the listed entity'), having its Registered Office at Plot no 45/46, Piperia Industrial estate, Phase-II, Silvassa DN 396230. Secretarial Review was conducted in a manner that provided me/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 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 31st March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

We, Vikas R. Chomal and Associates, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Supertex Industries Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2024 ("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 to the Company during the Review Period)
- (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 Securities) Regulations, 2021; (Not applicable to the Company during the Review Period)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder.
  - 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:

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regu- lation/ Circular No.	Deviations	Action Taken by	Type of Actio n	Details of Violation	Fine Amou nt	Observations/ Remarks of the Practicing Company Secretary	Man- age- ment Re- sponse	Re- marks
1	As per SEBI's circular no. CIR/ISD /3/2011 dated 17 <sup>th</sup>	Regulati on 31 of SEBI (LODR) Regulati on, 2015	The Promoters Shareholdi ng of the Company is not 100% held in demateriali	PCS	Listed entity have followed up Vigorousl y for the same with the	The Promoters Shareholdi ng of the Company is not	•	The Promoters Shareholdi ng of the Company is not	Listed entity have followe d up Vigoro	-



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	and as		i.e. 0.002%)		promoter	in		in	the	
	per		are still in		. He has	dematerial		dematerial	same	
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	SEBI				share				concern	
	(LODR)				certificate				ed	
	Regulatio				and has				promot	
	n, 2015				applied for new				er. He	
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4		Regulati	submission	DSE	Imposed Fine.		9,440/-	Late	Late	not
	n 13(3) of SEBI	on 13(3)	of			submissio	Includin	submissio	submis	paid
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	Reg., 2015	(LODR)	report on Investor			Quarterly	y Ost	Quarterly	Quarter	compa
	The	Reg.,	Complaints			report on		report on	ly	ny yet.
	Listed	2015	for quarter			Investor		Investor	report	119 901.
	Entity		ended 31st			Complaint		Complaint	on	
	shall file		March, 2024.			s for		s for	Investo	
	with					quarter		quarter	r	
	recognize					ended 31st		ended 31st	Compl	
	d stock					March,		March,	aints	
	exchange					2024.		2024.	for	
	(s) on a								quarter	
	quarterly								ended	
	basis,								31st	
	within								March,	
	twenty								2024.	
	one days								۷۷ <del>۷1</del> .	
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(LODR) (Reg., 2015 The Listed entity shall submit to the stock exchange  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  Reg., 2015  (LODR)  (LODR)  Reg., 2015  (LODR)  (LODR)  Reg., 2015  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (LODR)  (Reg., 2015  (LODR)  (LODR)  (Reg., 2015  (LODR)  (LODR)  (Reg., 2015  (LODR)  (LODR)  (Reg., 2015  (LODR)  (LODR	of Paid
Reg., 2015 The Listed entity shall submit to the stock exchange  Reg., 2015  The Listed a continuous pattern for quarter for quarter for quarter for quarter g pattern for quarter shareholdi ng pattern for quarter for quarter ended on 30th June, 2023 & 31st March, 2024.  g pattern for quarter for quarter ended on 30th June, 2024.  30th June, 2023 & 31st March, March, March, March,  March,  March,  Quarter for quarter ended on 30th June, 2023 & 31st March, March,  Mar	rter Rs
The Listed entity shall submit to the stock exchange (LODR) for quarter ended on 30th June, 2023 & 31st March, 2024. Shareholdi ng pattern for quarter ended on 30th June, 2023 & 31st ended on 30th June, 2023 & 31st March, 2024. Shareholdi ng pattern for quarter ended on 30th June, 2023 & 31st March, 2023 & 31st March, 2023 & 31st March, March, quarter ended on 30th June, 2023 & 31st March, March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, 2023 & 31st March, quarter ended on 30th June, 2023 & 31st March, 2023 & 31	
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entity shall submit to the stock exchange entity shall shall submit to the stock exchange entity shall shall submit to the stock exchange entity shall	າ ng Gst
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format specified	is
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Board on	g to be
quarterly	paid.
basis,	
within	
Twenty	
one days	
from the	
end of the	
each	

	anonton									
	quarter.									
4	As per Regulatio n 76 of SEBI(Dep ositories and Participa nts) Regulatio n, 2018 The Listed Entity shall submit Reconcili ation of Share capital audit report on quarterly basis within thirty days from the end of the each	As per Regulati on 76 of SEBI(De positori es and Particip ants) Regulati on, 2018	Late submission of Quarterly report on Reconciliati on of Share Capital Audit Report for quarter ended 31st March, 2024.			Late submissio n of Quarterly report on Reconciliat ion of Share Capital Audit Report for quarter ended 31st March, 2024.	-	Late submissio n of Quarterly report on Reconcilia tion of Share Capital Audit Report for quarter ended 31st March, 2024.	Late submis sion of Quarter ly report on Reconci liation of Share Capital Audit Report for quarter ended 31st March, 2024.	-
5	As per Regulatio n 40(10) of SEBI (LODR) Reg., 2015 The Listed entity shall ensure that the certificate mentione	As per Regulati on 40(10) of SEBI (LODR) Reg., 2015	Late submission of Yearly Compliance on certificate issued by Practicing Company Secretary under regulation 40(9) of SEBI (LODR) Reg., 2015 for quarter	PCS	Late submi ssion	Late submissio n of Yearly Complianc e on certificate issued by Practicing Company Secretary under regulation 40(9) of	-	Late submissio n of Yearly Complianc e on certificate issued by Practicing Company Secretary under regulation 40(9) of	Late submis sion of Yearly Compli ance on certifica te issued by Practici ng Compa	-

d under		d 31 <sup>st</sup>	SEBI	SEBI	ny	
sub-	Marc 2024.		(LODR)	(LODR)	Secreta	
regulatio	2024.		Reg., 2015	Reg., 2015	ry	
n (9) of			for quarter	for quarter	under	
Regulatio			ended 31st	ended 31st	regulati	
n 40 of			March,	March,	on	
the			2024.	2024.	40(9) of	
SEBI(LO					SEBI	
DR) Reg.,					(LODR)	
2015 shall					Reg.,	
be filed					2015	
with						
stock					for	
exchange					quarter	
(s) within					ended	
30 days					31st	
from the					March,	
end of the					2024.	
Financial						
Year.						

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

Sr.	Com-	Regu-	Deviations	Action	Type of	Details of	Fine	Obser-	Man-	Re-
No.	pliance	lation/		Taken	Action	Violation	Amount	vations/	age-	marks
	Require-	Circular		by				Remarks	ment	
	ment	No.						of the	Re-	
	(Regu-							Practicing	sponse	
	lations/							Company		
	circulars/							Secretary		
	guide-									
	lines									
	including									
	specific									
	clause)									



1	As per SEBI's	Regulati on 31 of	The Promoters	Listed entity	NA	The Promoter	NA	The Promoters	Listed entity	-
	circular	SEBI	Shareholdin g of the	have		s		Shareholdi	have	
	no.	(LODR)	Company is	follow		Sharehol		ng of the	followe	
	CIR/ISD	Regulati	not 100%	ed up		ding of		Company	d up	
	/3/2011	on, 2015	held in	Vigoro		the		is not	Vigoro	
	dated 17 <sup>th</sup>		demateriali zed form.	usly		Company		100% held	usly for	
	June 2011 and as		(180 Shares	for the		is not		in	the	
	per		i.e. 0.002%)	same		100%		dematerial	same	
	Regulatio		are still in	with		held in		ized form.	with	
	n 31 of		Physical form.	the		demateri			the	
	SEBI		101111.	concer		alized			concern	
	(LODR)			ned		form.			ed	
	Regulatio			promo					promot	
	n, 2015			ter. He					er. He	
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II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Compliances with the following conditions while app	ointing/re-appointin	ıg an 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		
	<ul> <li>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</li> <li>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.</li> </ul>	NA	No such resignation. However, the Auditor's have been reappointed under Section 139(1) after the expiry of 5 years of its term subject to the approval of members in ensuing AGM.
2.	Other conditions relating to resignation of statutory a	nuditor	ensuing / Civi.
	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.	NA	No such resignation
Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*

	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 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.		
3.	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	No such resignation

III. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr.	Particulars	Compliance	Observations
No.		Status	/Remarks by
		(Yes/No/ NA)	PCS*

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
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		The Company does not have any subsidiary/material subsidiary.
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	
3.	<ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under aseparate section on the website</li> <li>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</li> </ul>	Yes	
2.	<ul> <li>Adoption and timely updation of the Policies:</li> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	
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	

Preservation of Documents:		
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	
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	
Related Party Transactions:		
(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	
(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.		
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	
Prohibition of Insider Trading:	Yes	
The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
Actions taken by SEBI or Stock Exchange(s), if any:		Stock Exchange has
Action(s) 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	NA	imposed a fine for delay in submission of certain compliances.
	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.  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.  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.  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.  Prohibition of Insider Trading:  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.  Actions taken by SEBI or Stock Exchange(s), if any:  Action(s) 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	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.  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.  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.  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.  Prohibition of Insider Trading:  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.  Actions taken by SEBI or Stock Exchange(s), if any:  Action(s) 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

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
12.	Additional Non-compliances, if any:		
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

### 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 VIKAS R CHOMAL AND ASSOCIATES

VIKAS Digitally signed by VIKAS RAMCHAN RAMCHANDRA CHOMAL Date: 2024.05.30 CHOMAL 17:58:46 +05'30'

VIKAS R CHOMAL PRACTICING COMPANY SECRETARIES

FCS NO: 11623 Date: 30.05.2024

COP: 12133 Place: Thane, Maharashtra

ICSI Firm Peer Review Reg No: S2013MH21650

ICSI UDIN: F011623F000503477