SAVITA JYOTI ASSOCIATES
COMPANY SECRETARIES

CS. SAVITA JYOTI, B.Com., F.C.S.

SECRETARIAL COMPLIANCE REPORT OF

M/S SSPDL LIMITED

CIN: L70100TG1994PLC018540
Regd. Off: 3rd Floor, Serene Towers, 8-2-623/A, Road No. 10,
Banjara Hills, Hyderabad-500034, Telangana, India

[as per the regulation 24(A) of SEBI (LODR) Regulations, 2015 as amended from time to time]

I, Savita Jyoti proprietor of M/s. Savita Jyoti Associates, Practicing Company Secretary (CP No: 1796, M. No. 3738), have examined:

(a) all the documents and records made available to us, and explanation provided by **M/s. SSPDL 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 financial year ended 31st March 2024 (**'the 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 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 during the Review Period.

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

(f) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; Not Applicable during the Review Period.

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

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E-mail: savitajyoti@yahoo.com

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

and based on the above examination, I, 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)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of The Practicing Company Secretary	Management Response	Remarks
---------- Not Applicable ----------										

(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	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of The Practicing Company Secretary	Management Response	Remarks
---------- Not Applicable ----------										

(c) I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/ Remarks by PCS
1.	**Secretarial Standards:** The compliances of the listed entities are in accordance with the applicable Secretarial Standards (SS) issued by the Institute Company Secretaries of India (ICSI)	YES	None
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 entity	YES	None

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/ Remarks by PCS
	• 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	None
3.	**Maintenance and disclosures on Website:**		
	• The listed entity is maintaining a functional website	YES	None
	• Timely dissemination of the documents/information under a separate section on the website	YES	None
	• 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	None
4.	**Disqualification of Director(s):** None of the Director of the listed entity are disqualified under Section 164 of Companies Act, 2013	YES	None
5.	**Details related to Subsidiaries of listed entities:**		
	a. Identification of material subsidiary companies	YES	None
	b. Requirements with respect to disclosure of material as well as other subsidiaries	Yes	None
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	None
7.	**Performance Evaluation:** The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations	YES	None
8.	**Related Party Transactions:**		
	a. The listed entity has obtained prior approval of Audit Committee for all related party transactions	YES	None

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/ Remarks by PCS
	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	NA	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 SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	YES	None
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	None
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.	YES	No Actions taken against the Company/its promoters/directors/ subsidiaries either by SEBI or by BSE & NSE under SEBI Regulations and circulars/guidelines issued thereunder 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.	NA	No such event occured
13.	**Additional non-compliances, if any:** No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	No additional non-compliance was observed for any SEBI regulation/circular/guidance note etc. during the Review Period.

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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 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 (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.

Place: Hyderabad
Date: 23/05/2024

For **SAVITA JYOTI ASSOCIATES**

Savita Jyoti

CS Savita Jyoti
Practicing Company Secretary
M. No. FCS No. 3738
CP. No. 1796
UDIN: F003738F000430186
PR No:1326/2021

SAVITA JYOTI, FCS 3738
Practicing Company Secretary
Certificate of Practice No. 1796

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