*M. Maheshwari & Associates*
*Company Secretaries*

301, Shalimar Corporate Center,
8-B South Tukoganj, Indore - 452001
Ph.: 0731-4068730
Mob.: 9826040473
Email : cs@mmaheshwari.com
Website : www.mmaheshwari.com

*Manish Maheshwari*
M.Com, LLB, F.C.S

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SIGNET INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31, 2026**

To
The Board of Directors
**SIGNET INDUSTRIES LIMITED**
**CIN: L51900MH1985PLC035202**
Gala no. 02 & 03, Building No. A-2, Gr. Floor,
Print World Industrial Complex,
Survey no. 15/1, Road, Mankoli Vehele,
Village Vehele, Bhiwandi, Shastrinagar
(Thane), Maharashtra 421302

Sir/Madam

We, M/s. M. Maheshwari & Associates, Practicing Company Secretaries, have examined:

a) All the documents and records made available to us and explanations provided by **M/s. SIGNET INDUSTRIES LIMITED** ("the listed entity") and its management,

b) The filings/ submissions made by the listed entity to the stock exchanges,

c) Website of the listed entity https://www.groupsignet.com

d) Any other document/filing, as may be relevant, which has been relied upon to make this Report, for the year ended March 31, 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, and guidelines, issued thereunder; and

   b. The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the regulations, circulars, and guidelines, issued thereunder by the Securities and Exchange Board of India ("SEBI");

M. Maheshwari & Associates ★ Company Secretaries ★ C.P. 3860 FCS 5174

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 - SEBI (LODR) to the extent applicable.

b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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

The company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms/returns under:

a) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

c) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;

e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021and circulars/ guidelines issued thereunder;

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



M. Maheshwari & Associates ★ Company Secretaries ★ C.P. 3860 FCS 5174

**I (a)** The listed entity has majorly 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 clauses) | 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 |
|---|---|---|---|---|---|---|---|---|---|---|
| 1. | The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, on a quarterly basis, within 21 days from the end of each quarter under Regulation 31 of SEBI LODR. | 31 SEBI LODR | The Shareholding Pattern for the quarter ended 31 December 2025 was submitted to the Stock Exchange with a delay of one day beyond the prescribed timeline under | Fine levied by BSE | Monetary Action | Delay in submission of Shareholding Pattern under Regulation 31(1)(b) for the quarter ended 31 December 2025.<br><br>**Due Date:** 21 January 2026; | Rs. 2,360/- | The Company did not comply with the timeline prescribed under Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015 and submitted the Shareholdin | The Company has paid the fine levied by the Stock Exchange and has strengthened its internal compliance monitoring mechanism to ensure timely submissions in future. | The Company should ensure regular monitoring and timely compliance. |



M. Maheshwari & Associates ★ Company Secretaries ★ C.P. 3860 FCS 5174

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | Regulation 31(1)(b). | | | **Actual Date of Submission** : 22 January 2026.<br><br>Delay of one day in submission of Shareholding Pattern for the quarter ended 31 December 2025 under Regulation 31(1)(b) of SEBI (LODR) Regulations, 2015. | | g Pattern for the quarter ended 31 December 2025 with a delay of one day. Consequently, the Stock Exchange levied a fine in accordance with the SEBI SOP Circulars relating to non-compliance with certain provisions of the SEBI (LODR) Regulations, 2015. | | |



M. Maheshwari & Associates ★ Company Secretaries ★ C.P. 3860 FCS 5174

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| 2. | The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter under Regulation 33 (3) (a) of SEBI LODR.<br><br>Consequently, the Company has delayed in submission of RPT disclosure under Integrated Financials for the half year ended September 30, 2025. | 33(3)(a) of SEBI (LODR) Regulations, 2015<br><br>Regulation 23(9) of SEBI (LODR) Regulations, 2015 | The Financial Results for the quarter ended 30 September 2025 were submitted to the Stock Exchange with a delay of one day beyond the prescribed timeline. Consequentl y, the Company has delayed in submission of RPT disclosure under Integrated Financials | None | Nil | The Financial Results for the quarter ended September 2025 were required to be submitted on or before **14 November 2025**. However, the Company submitted the same on **15 November 2025**, resulting in a delay of one day and non-compliance with Regulation 33(3)(a) of | NIL | The Company did not comply with the timeline prescribed under Regulation 33(3)(a) and 23(9) of SEBI (LODR) Regulations, 2015 and submitted the quarterly financial results and RPT disclosure for the quarter ended 30 September 2025 with a | Company shall take adequate measures to ensure timely compliance with the applicable provisions in future. The has received an email regarding the delay on which reply has been made via email and matter has been closed. | Company may face penalties, fines or other regulatory action for delay submissio n occurred. |

M. Maheshwari & Associates ★ C.P. 3860 FCS 5174 ★ Company Secretaries

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | for the half year ended September 30, 2025. | | | SEBI (LODR) Regulations, 2015 further in compliance with Regulation 23(9) of SEBI LODR listed entity shall make such disclosures every six months on the date of publication of its standalone and consolidated financial results hence RPT disclosures has been submitted with delay. | | delay of one day. No fine/penalty has been levied and no action has been initiated by any regulatory authority. | | |



M. Maheshwari & Associates
C.P. 3860
FCS 5174
Company Secretaries

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

| S. No | Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS) | Observations made in the secretarial compliance report for the year ended 31st March 2025. | Compliance Requirement (Regulations/ circulars/ guidelines including specific clauses) | Details of violations/ deviations and Actions taken / penalty imposed, if any, on the listed entity | Remedial actions, if any, taken by the listed entity | Comments of the PCS on the actions taken by the listed entity |
|---|---|---|---|---|---|---|
| 1. | The Company made backdated appointments of Independent Directors, potentially contravening regulatory requirements and the effective dates of appointments March 25, 2023, and May | The Company should ensure that all appointments and resolutions are properly documented and aligned with regulatory requirements to avoid similar deviations in the future. | Retrospective approval for reappointment of Independent Directors for a second term. | Warning given by NSE | Company insured that strict adherence to regulatory timelines and procedures for future appointments and also strengthen the internal processes to maintain timely compliance. | The Company has disseminated a copy of the warning letter on both the Stock Exchange(s) and also placed the warning letter before the Board meeting held on 14th November, 2024. |



M. Maheshwari & Associates * Company Secretaries * C.P. 3860 FCS 5174

| | | | | | | |
|---|---|---|---|---|---|---|
| | 22, 2023 predate the Board meeting date May 30, 2023 suggesting procedural irregularities. | | | | | |
| 2. | The Company has made Delay in uploading the details that may impede stakeholders' access to relevant information, compromising transparency and potentially impacting decision-making. | The Company should ensure regular monitoring and timely updates of its website to maintain compliance and transparency, thereby fostering stakeholder trust. | The Company shall ensure timely dissemination of documents/information on its website, updating any changes in content within two working days from the date of such change. | No action has been initiated by any regulatory authority as on the date of this Report. | The Company has implemented corrective measures to strengthen website management, and ensure timely compliance | |



M. Maheshwari & Associates
C.P. 3860
FCS 5174
Company Secretaries

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:**<br><br>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 | Nil |
| 2. | **Adoption and timely updation of the Policies:**<br>• All applicable policies under SEBI Regulations are adopted with the approval of the board of directors / Committees, as may be applicable to the listed entities.<br>• All the policies are in conformity with SEBI Regulations and have been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI. | Yes<br><br>Yes | Nil<br><br>Nil |
| 3. | **Maintenance and disclosures on the Website:**<br>• The Listed entity is maintaining a functional website.<br>• Timely dissemination of the documents/ information under a separate section on the website.<br>• 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<br><br>Yes<br><br>Yes | Nil<br><br>Nil<br><br>Nil |
| 4. | **Disqualification of Director:**<br><br>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | Nil |

M. Maheshwari & Associates
C.P. 3860
FCS 5174
Company Secretaries

| | | | |
|---|---|---|---|
| 5. | **Details related to Subsidiaries of listed entities have been examined w.r.t.:**<br>(a) Identification of material subsidiary companies<br>(b) Disclosure requirement of material as well as other subsidiaries | NA<br>NA | The Listed entity does not have any Material subsidiary or any other subsidiaries. |
| 6. | **Preservation of Documents:**<br>The company is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per the Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015. | Yes | Nil |
| 7. | **Performance Evaluation:**<br>The listed entity has conducted a 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 | Nil |
| 8. | **Related Party Transactions:**<br>(a) The listed entity has obtained prior approval of the Audit Committee for all related party transactions;<br>(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<br>NA | The Company has obtained prior approval for Related Party Transactions. |

**Observation:** During the review of the Related Party Transaction disclosures submitted by the Company to the Stock Exchange in XBRL format, it was observed that certain opening and closing balances pertaining to related party transactions were reflected as negative figures. While the underlying transactions were duly disclosed and approved by the Audit Committee in accordance with the applicable provisions, the presentation of such balances in negative amounts may lead to interpretational ambiguity for stakeholders and users of the disclosed information. The Company may consider reviewing its reporting methodology and XBRL tagging process for future filings to ensure greater clarity, consistency, and ease of understanding of the disclosures.





| | | | |
|---|---|---|---|
| 9. | **Disclosure of events or information:**<br><br>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 | Nil |
| 10. | **Prohibition of Insider Trading:**<br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. | Yes | Nil |
| 11. | **Actions taken by SEBI or Stock Exchange(s), if any:**<br><br>No Actions were 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. (or)<br><br>~~The actions taken against the listed entity/its promoters/directors/subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.~~ | Yes | Fine of Rs.2,360/- has been levied on company. |
| 12. | **Resignation of statutory auditors from the listed entity or its material subsidiaries:**<br><br>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 resignations were reported during the period under review. |
| 13. | **Additional non-compliances, if any:**<br>No additional non-compliance was observed for any SEBI regulation/circular/guidance note etc. | No | During the review of the revised Shareholding Pattern for the quarter ended 30 September 2025 |



M. Maheshwari & Associates * Company Secretaries * C.P. 3860 FCS 5174

| | | | |
|---|---|---|---|
| | | | filed by the Company on 21 January 2026, it was observed that the promoter shareholding was reported as 21,458,281 shares. However, based on the records made available for verification, the promoter shareholding as on 30 September 2025 was 21,424,094 shares. Accordingly, the revised filing reflects a variance of 34,187 shares from the shareholding position as on the relevant reporting date. As a consequence, the corresponding public shareholding disclosed in the revised shareholding pattern also appears to have been impacted |





We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. **Not Applicable**

**Assumptions & limitations of scope and review:**

1. Compliance with 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 on our examination of relevant documents and information.

3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity. This is neither an audit nor an expression of opinion.

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 M. Maheshwari & Associates**
**Company Secretaries**
**Firms U.C.N. I2001MP213000**




**Manish Maheshwari**
**Proprietor**
**FCS-5174**
**CP-3860**
**PR No. 7870/2026**

**Date: 30th May 2026**
**Place: Indore (MP)**
**UDIN: F005174H000558067**