



CIN No. L24232PB1983PLC005426
D.L. No. 1800-OSP, 1804-B

GST No. 03AAACK6458M1ZB
I.E. Code No. 1293001210

KWALITY PHARMACEUTICALS LIMITED
Regd. Office: Village Nag Kalan, Majitha Road, Amritsar - 143 601 (INDIA)

Phone : 91-8558820862 (Accounts)
: 91-8558820863 (Admin.)
: 91-9915743720 (Exports)
M.D. Mobile : 91-9814071215, 9814052314
E-mail : export@kwalitypharma.com
ramesh@kwalitypharma.com
Website : www.kwalitypharma.com

Date: May 30, 2025

To,
The Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai - 400001.

Scrip Code: 539997

Subject: Submission of Annual Secretarial Compliance Report for year ended March 31, 2025

Dear Sir/Madam,

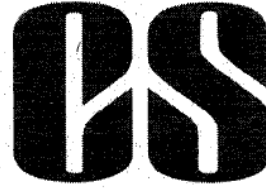
Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith Annual Secretarial Compliance Report of the Company issued by M/s **Rishi Mittal & Associates, Practicing Company Secretaries** for the financial year ended March 31, 2025.

You are requested to take the same on record.

Thanking you,

For KWALITY PHARMACEUTICALS LIMITED

RAMESH ARORA
Managing Director
DIN: 00462656



RISHI MITTAL & ASSOCIATES
COMPANY SECRETARIES

945, GALI NEEL WALI, LACHHMANSAR, AMRITSAR-143001

☎ 98154-52825

Email:- rmittals@gmail.com

SECRETARIAL COMPLIANCE REPORT OF 'KWALITY PHARMACEUTICALS LIMITED'
FOR THE FINANCIAL YEAR ENDED MARCH 31ST 2025

We have examined:

- (a) all the documents and records made available to us and explanation provided by **KWALITY PHARMACEUTICALS 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 report,

for the financial year ended **March 31, 2025** ("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 for the period under review**
- (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 for the period under review**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not applicable for the period under review**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not applicable for the period under review**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 ;
 (i) All other regulations as applicable and circulars/ guidelines issued thereunder as applicable to listed entity from time to time.

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)	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.	As per Regulation 24A(2) of SEBI (LODR) Regulations, 2015 every listed entity shall submit a secretarial compliance report in such form as specified, to stock exchanges, within sixty days from end of each financial year.	Regulation 24A(2) of SEBI (LODR) Regulations, 2015	There was delay of 1 day in submission of XBRL format of report for year ended 31-03-2024 with BSE	BSE	Penalty of Rs.2360 was imposed on company for delay filing of secretarial compliance report	There was delay of 1 day in submission of XBRL format of report for year ended 31-03-2024 with BSE	Rs.2360	Penalty was paid	The company had filed the PDF report within the due date on 30th May, 2024 but due to some technical problem in login, xbrl could not be uploaded on same day at BSE portal	The company will remain careful in future. Penalty was paid

(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 (PCS) in the previous reports)	Observations Made in the Secretarial compliance report for the year ended	Compliance Requirement (Regulations/ circulars/ Guidelines including Specific clause)	Details of violation / 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 listed entity had to submit to the stock exchange and publish on its website- a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders but there was delay of 2 days in submission of annual report with BSE.	31-03-2024	Regulation 34 of SEBI (LODR) Regulations, 2015	There was delay of 2 days in submission of annual report with BSE. Penalty of Rs.4720 was imposed on company for delay filing of annual report	Penalty of Rs.4720 was paid	Penalty of Rs.4720 was paid by the listed entity

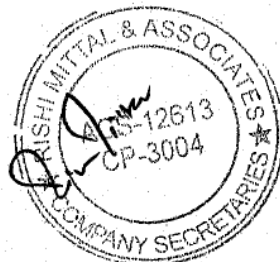


2.	The proceedings of Annual General Meeting of the company held on 30-09-2023 as required under Regulation 30(6) of SEBI (LODR) required to be submitted to stock exchange not later than 12 hours of occurrence of event and if disclosure made after 12 hours, the company along with disclosure required to provide explanation for such delay. The company has made delay in submission of proceedings to stock exchange and received letter from BSE for clarification.	31-03-2024	Regulation 30(6) of SEBI (LODR) Regulations, 2015	The company has made delay in submission of proceedings to stock exchange and received letter from BSE for clarification. No penalty imposed.	The company had resubmitted the proceedings along with clarification regarding delay in submission to BSE.	The company had resubmitted the proceedings along with clarification regarding delay in submission to BSE.
3.	Under Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016, the company was required to inform the shareholder(s) concerned stating that the dividend on their shares has not been claimed for 7 consecutive years and if not claimed within the given period the said shares will be transferred to IEPF authority and the company also simultaneously had to publish a notice in the leading newspaper in English and regional language informing the concerned that the names of such shareholders and their folio number or DP ID - Client ID are available on their website duly mentioning the website address. The company had to complete both these assignments by 27-10-2023 but it could send notices to shareholders by 13-11-2023 and gave newspaper advertisements on 11-11-2023. So there was delay of around 17 days.	31-03-2024	Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016	The company was required to inform the shareholder(s) concerned stating that the dividend on their shares has not been claimed for 7 consecutive years and if not claimed within the given period the said shares will be transferred to IEPF authority and the company also simultaneously had to publish a notice in the leading newspaper in English and regional language informing the concerned that the names of such shareholders and their folio number or DP ID - Client ID are available on their website duly mentioning the website address. The company had to complete both these assignments by 27-10-2023 but it could send notices to shareholders by 13-11-2023 and gave newspaper advertisements on 11-11-2023. So there was delay of around 17 days. No penalty imposed.	The management and compliance officer have confirmed that the delay was due to technical reasons and unintentional and compliance was made later.	The management and compliance officer have confirmed that the delay was due to technical reasons and unintentional.

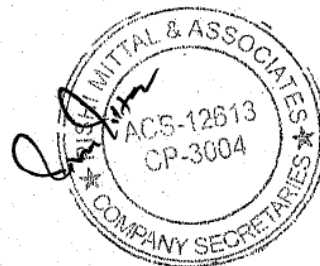


We hereby report that, during the review period the compliance status of the listed entity with the following requirements :

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>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).</p>	Yes	NIL
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● 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	NIL NIL
3.	<p>Maintenance and disclosures on Website:</p> <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 re-directs to the relevant document(s)/section of the website 	Yes Yes Yes	NIL NIL NIL
4.	<p>Disqualification of Director(s):</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	NIL
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <ul style="list-style-type: none"> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 	N.A. Yes	The company has one subsidiary company but does not have any material subsidiary for the period under review hence the Clause (a) & Clause (b) to the extent of the Material subsidiary are not applicable.



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	NIL
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	NIL
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.	NIL All related party transactions entered into by the listed entity during the review period were duly approved by the audit committee.
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	NIL
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	NIL
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 except as provided under separate paragraphs herein.	Yes	NIL



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 was no such 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. except as reported above.	Yes	NIL

Further, the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations are not applicable to the Listed Entity.

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 Rishi Mittal & Associates
Company Secretaries

(Rishi Mittal)
Prop.

ACS No. 12613

C P No.: 3004

UDIN: A012613G000480883

PR No. : 2486/2022

Date:- 28-05-2025

Place:- Amritsar

