



**S.R. Khandelwal & Associates
Company Secretaries**

Secretarial Compliance Report of Taparia Tools Limited for the financial year ended 31st March, 2026

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Taparia Tools Limited (hereinafter referred as 'the listed entity'), having its Registered Office at 52 & 52, B MIDC Area, Satpur, Nashik MH 422007 IN Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my 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, I hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I Neha Yogesh Apte have examined:

- (a) All the documents and records made available to me and explanation provided by **Taparia Tools 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 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, guidelines issued thereunder; and





**S.R. Khandelwal & Associates
Company Secretaries**

- (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 (including amendments, modifications form time to time), 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 and amendments for time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments for time to time; (Not Applicable during the Review Period)
- (c) Securities and Exchange Board of India (substantial Acquisition of Shares and Takeovers) Regulations, 2011 amendments for time to time;
- (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 (Shares 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;

and circulars/guidelines issued thereunder;

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:





**S.R. Khandelwal & Associates
Company Secretaries**

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





S.R. Khandelwal & Associates
Company Secretaries

1.	(Listing Obligation and Disclosure Requirement) Regulations 2015	31(2)	100% shareholding of promoter & promoters group are not held in Dematerialized Form as required under the regulation	-	-	-	-	Out of 100% of the shareholding held by promoter and promoter Group 0.011% shareholding is not in dematerialized form.	The Promoters and Promoter Group have already de- materialized the majority of their shareholding. The Company wishes to inform that only 1,664 equity shares held by the promoters remain in physical form, representing 0.011% of the total paid-up equity share capital of the Company. The concerned shareholder has initiated the necessary process for issuance of duplicate share certificates / letter of confirmation in accordance with the applicable regulatory requirements. Further, all other shareholders forming part of the Promoter and Promoter Group hold their shares in dematerialized form.	-
----	--	-------	---	---	---	---	---	--	---	---

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





S.R. Khandelwal & Associates
Company Secretaries

2.	Submission of Annual Report within the prescribed timeline under Regulation 34 of the SEBI (LODR) Regulations, 2015	Regulation 34 of SEBI (LODR) Regulations, 2015 read with SEBI Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (Chapter VII (A) – Penal Action for Non-Compliance)	Delay in submission of Annual Report for the financial year ended March 2025 within the prescribed timeline.	Stock Exchange	Levy of monetary penalty	The Company failed to submit the Annual Report within the period prescribed under Regulation 34 of the SEBI (LODR) Regulations, 2015, resulting in levy of fine by the Stock Exchange.	₹ 18,880/- (inclusive of GST)	The Company received an email regarding the delayed submission of its Annual Report for the financial year ended March 2025, which resulted in penal action under the applicable SEBI regulations. The Company has since complied with the submission requirements and has duly paid the imposed fine vide Receipt No. HIDFON52025111804758322, dated November 18, 2025.	We reiterate that the necessary disclosures pertaining to the Annual Report, Notice of AGM dated 05/08/2025, and Record Date for the AGM were duly submitted under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, within the stipulated timeframe as on 09-07-2025. A copy of the acknowledgment for the said submission was sent to the Exchange. There has been no delay on the part of the Company. However, to avoid further consequences, the Company has paid the fine of INR 16,000 + GST to the Exchange.	No further liability or material impact.
----	---	---	--	----------------	--------------------------	--	-------------------------------	--	---	--

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





S.R. Khandelwal & Associates
Company Secretaries

(b) The listed entity has taken the following actions to comply with the observations made in previous reports: The company took the action in the same period and hence no further action were required to be taken on the observations 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

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





S.R. Khandelwal & Associates
Company Secretaries

C. I 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 entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	The company has complied with this clause

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





S.R. Khandelwal & Associates
Company Secretaries

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 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	The company has complied with this clause
----	---	-----	---

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





3.	Maintenance and disclosures on Websites: • 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 Regulations 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website	Yes	No reverse observation The company has complied with this clause The company has complied with this clause
-----------	---	------------	---





S.R. Khandelwal & Associates
Company Secretaries

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	The company has complied with this clause
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	NA	As on 31 st March, 2026, the Company does not have any subsidiary. No Observation since this clause is not applicable

Address: 5th Floor Mayanagari Society, 619 Sadashiv Peth Pune -411030
Email: neha@srkcs.com ; Cell: 9823162850





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	The company has complied with this clause
----	--	-----	---





S.R. Khandelwal & Associates
Company Secretaries

7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, Independent Directors and committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	There is a marking system for the evaluation which is satisfactory in accordance with SEBI regulations
----	---	-----	--





S.R. Khandelwal & Associates
Company Secretaries

8.	Related Party Transactions:	Yes	The company has Complied with applicable provisions
	(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.	NA	





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	No reverse observation
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	No reverse observation





S.R. Khandelwal & Associates
Company Secretaries

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 paragraph herein :	Yes	The Company received an email regarding the delayed submission of its Annual Report for the financial year ended March 2025, which resulted in penal action under the applicable SEBI regulations. The Company has since complied with the submission requirements and has duly paid the imposed fine vide Receipt No. HDFCN5202511180475 8322, dated November 18, 2025.
-----	--	------------	--





S.R. Khandelwal & Associates
Company Secretaries

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(is) 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	The clause is not applicable as no statutory auditor has resigned during the year
13.	Additional Non-compliances, if any:	NA	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.

<Intentionally Left Blank





S.R. Khandelwal & Associates
Company Secretaries

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. My responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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 S R Khandelwal & Associates
Company Secretaries
ICSI Unique code: P2024MH737700

Neha Apte
NEHA YOGESH APTE
Partner
Company Secretary FCS: 8441 EP 0038



Date: 15/04/2026
Place: Pune
UDIN: F008441H000108343
Peer Review Certificate No. 6640/202