

28th May, 2025

To,
BSE Limited
Phiroze Jeejeebhoy Towers, 27th Floor, Dalal Street
Mumbai 400 023.

Ref: Security Code no. 517119

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2025

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

This is for your information and records.

Thanking you,

Yours faithfully,
For PCS Technology Limited
SANDEEP
PATEL
Sandeep Patel
Company Secretary & Compliance Officer

Digitally signed by
SANDEEP PATEL
Date: 2025.05.28 14:36:37
+05'30'

Enclosure: Secretarial Compliance Report

PCS TECHNOLOGY LIMITED

Reg. Office: S. NO. 1A, F-1, Irani Market Compound, Yerawada, Pune – 411006

Corporate Office.: 8th Floor, Technocity Building, Plot No. X- 5/3, Mahape, MIDC, Navi Mumbai, 400 710.

CIN: L74200MH1981PLC024279, Tel: 020-26681619, Web: www.pcstech.com Email: investorsgrievances@pcstech.com



SECRETARIAL COMPLIANCE REPORT OF PCS TECHNOLOGY LIMITED

FOR THE YEAR ENDED 31st MARCH, 2025

(Pursuant to regulation 24A of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015)

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **PCS Technology Limited** (CIN:L74200MH1981PLC0 24279) (hereinafter referred as 'the listed entity'), having its Registered Office at S. NO. 1A, F-1, Irani Market Compound, Yerawada, Pune City, Maharashtra, India, 411006. Secretarial Review was conducted in a manner that provided me 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 2025** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I Kaushal Doshi, Proprietor of M/s. Kaushal Doshi & Associates, Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **PCS Technology 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 year ended **31st March, 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:-

- and based on the above examination, I hereby report that, during the review Period:

[illegible]

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

Sr. No.	Obser- vations/ Remarks of the Practicing Company Secretary in the previous reports	Obser- vations made in the secretarial compliance report for the year ended 31.03.2024	Compliance Requirement (Regu- lations/ circulars/ guide- lines including specific clause)	Details of Violation/devi ations 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
	It is mandatory to give outcome within 30 minutes of the completion of the Board Meeting which was not uploaded for the Board meeting held on August 09, 2023	Financial Year ended March 31, 2024	Out come of board meeting As per Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015	It is mandatory to upload outcome of the Board Meeting within 30 minutes of the completion of the Meeting which was not uploaded for the Board meeting held on August 09, 2023	No action taken by the listed entity	None
	It is mandatory to give outcome within 30 minutes of the completion of the Board Meeting which was not uploaded for the Board meeting held on February 13, 2024	Financial Year ended March 31, 2024	Out come of board meeting As per Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015	It is mandatory to upload outcome of the Board Meeting within 30 minutes of the completion of the Meeting which was not uploaded for the Board meeting held on February 13, 2024	No action taken by the listed entity	None

(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.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None

2.	<u>Adoption and timely updation of the Policies:</u> <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	None
3.	<u>Maintenance and disclosures on Website:</u> <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	None
4.	<u>Disqualification of Director:</u> 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	None
5.	<u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u> <ul style="list-style-type: none"> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries 	Yes	None
6.	<u>Preservation of Documents:</u> 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.	<u>Performance Evaluation:</u> 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	None
8.	<u>Related Party Transactions:</u> <ul style="list-style-type: none"> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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	None
9.	<u>Disclosure of events or information:</u> 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.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None

11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.).</p>	NA	No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchange during the year under review.
12.	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>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.</p>	NA	There is no such resignations during the year under review.
13.	<p><u>Additional Non-compliances, if any:</u></p> <p>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.</p>	NA	No such non compliance during the year under review.

We further, report that the listed entity is in compliance/ not 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 & 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 account 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.

For Kaushal Doshi & Associates
Practicing Company Secretary

KAUSHAL
DHIRENDRA
DOSHI

Digitally signed by KAUSHAL
DHIRENDRA DOSHI
Date: 2025.05.27 18:54:09
+05'30'

Kaushal Doshi
Proprietor

FCS-10609 / COP- 13143
PR Number: 802/2020
UDIN: F010609G000451093

Date: 27th May, 2025
Place: Mumbai