

SECRETARIAL COMPLIANCE REPORT

(Pursuant to Regulation 24A of the SEBI (LODR) Regulations, 2015 read with various circulars issued by SEBI)

OF

SYNCOM FORMULATIONS (INDIA) LIMITED

for the year ended 31st March, 2026

We, M/s D.K. Jain & Co., Company Secretaries have examined:

- a) all the documents and records made available to us, and explanation provided by **Syncom Formulations (India) Limited** (CIN: L24239MH1988PLC047759);
- b) the filings/submissions made by the listed entity to BSE Ltd. at www.bseindia.com and to National Stock Exchange of India Ltd. at www.nseindia.com;
- c) website of the listed entity i.e. www.sfil.in
- 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, 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 there under; 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 and include: -

- (a) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (*Not applicable to the listed entity during the period under review, in view of that no securities were issued*);
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) SEBI (Buy back of Securities) Regulations, 2018 (*Not Applicable to the listed entity during the period under review in view of that no securities were buy back*);
- (e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (*Not applicable to the listed entity during the period under review in view of that no such scheme was made*);
- (f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (*Not applicable to the Listed entity during the period under review in view of that no such securities were issued and listed*);
- (g) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- (h) other regulations as applicable.

and the Circulars/Guidelines issued thereunder and based on the above examination, we hereby report that, during the Review Period:



1. (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 Practising Company Secretary	Management Response	Remarks
NIL										

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

S No	Observations/ Remarks of the Practising Company Secretary	Observation made in the Secretarial Compliance Report for the year ended	Compliance Requirement (Regulations/Circulars/ guidelines 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	2	3	4	5	6	7
1.	The company was previously disclosing all the disclosures under the internal TAB of International Market. However, after issuance of the Advisory, by NSE and BSE the company has disclosed the necessary disclosure on front webpage of the website.	31/03/2025	Maintenance of the Website	The company has not complied with the requirement of Regulation 46 of the Listing Regulations for not having functional website.	The company has complied with the same.	The company has taken Advisory which was taken seriously, and no such default has been observed at the time of review by us.



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	-
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of the Audit Committee for all related party transactions; (b) In case no prior approval is obtained, 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.	- It is observed that prior approval of Audit Committee has been obtained, wherever it was required.
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	-
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	-
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 or the action taken against the listed entity/its promoters/directors/subsidiaries either by the SEBI or by Stock Exchange are specified in the last column.	Yes	-
12.	Resignation of Statutory Auditors from the listed entity or its material subsidiaries: In case of resignation of Statutory Auditors from the listed entities or any of its material subsidiaries during the financial year, the listed entity and/or its material subsidiaries has/have complied with Para 6.1 and 6.2 of Section V-D Chapter V of Mater Circular on compliance with the provisions of LODR Regulations by Listed entities.	N.A.	There was no resignation of the Auditor of the company 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	N.A.	-



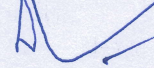
14.	<p>The listed entity to comply with the following requirements for disclosure of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR:</p> <p>a) The scheme document shall be uploaded on the website of the listed entity after obtaining shareholder approval as required under SEBI (SBEB) Regulations, 2021.</p> <p>b) The documents uploaded on the website shall mandatorily have minimum information to be disclosed to shareholders as per SEBI (SBEB) Regulations, 2021.</p> <p>c) The rationale for redacting information from the documents and the justification as to how such redacted information would affect competitive position or reveal commercial secrets of the listed entity shall be placed before the board of directors for consideration and approval.</p>	N.A.	The listed entity is not required to comply with the disclosure requirement of Employee Benefit Scheme Documents in terms of Regulations 46(2)(za) of LODR Regulations
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**Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'*

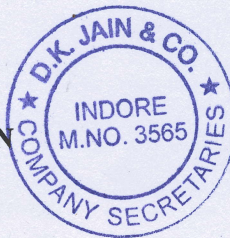
Assumptions & Limitation of scope and Review:

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, D. K. JAIN & CO,
COMPANY SECRETARIES
FRN No. S2003MP064600



CS (DR.) DILIP KUMAR JAIN
PROPRIETOR
FCS No.: 3565: C P No.: 2382
Peer review: 6672/2025



Place: Indore
Date: 6th May, 2026
UDIN: F003565H000293008