



Pasari Spinning Mills Limited

Date: 29th May, 2026

To,
Mr. Jeevan Noronha,
Manager,
Department of Corporate Services,
Bombay Stock Exchange,
P.J. Towers, Dalal Street,
Mumbai - 400001.

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2026.
Ref: BSE code: 521080 - Pasari Spinning Mills Limited

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith an Annual Secretarial Compliance Report for the financial year ending 31st March, 2026.

This is for your kind information and records.

Thanking you,
Yours faithfully

for Pasari Spinning Mills Limited

KRISHNA
KUMAR
GUPTA

Digitally signed by
KRISHNA KUMAR GUPTA

Krishna Kumar Gupta
Managing Director
DIN: 00003880

Address: A-21 Silver palm, Bldg 3, ,
Basavanagar Main, Vibhuthipura Extn,
Marathahalli Colony,
Bangalore -560067

No 18 III Floor, Anjaneya Temple Road, Yedyur, Jayanagar 6th Block, Bangalore – 560082

CIN: L85110KA1991PLC012537
Web: <http://www.pasariexports.com/>

Phone No: 91-80-2676-0125
Email: admin@pasariexports.com



Secretarial compliance report of **Pasari Spinning Mills Limited**
for the year ended 31st March, 2026

We have examined:

- a) all the documents and records made available to us and explanation provided by Pasari Spinning Mills 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
- 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 DURING REVIEW PERIOD)**.
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(NOT APPLICABLE DURING REVIEW PERIOD)**.
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(NOT APPLICABLE DURING REVIEW PERIOD)**.
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(NOT APPLICABLE DURING REVIEW PERIOD)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(NOT APPLICABLE DURING REVIEW PERIOD)**

g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(NOT APPLICABLE DURING REVIEW PERIOD)**

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

i) Other regulations to the extent as applicable and circulars/guidelines issued thereunder;

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:

S N o	Compliance Requiremen t (Regulations / circulars/ guidelines including specific clause)	Reg ulati on/ Circ ular No.	Devi-ations	Actio n Taken by	Typ e of Acti on	Details of Violation	Fine Amo unt	Observation s/ Remark of the Practicing Company Secretary (PCS)	Manage- ment Response	R e m ar k s
1	Prior Intimation of Board Meeting	29	Delay in prior intimation of Board Meeting	Stock Excha nge	Fine	The Compan y has been levied a penalty of Rs. 11,800	11,8 00	The Company has been levied a penalty of Rs. 11,800 (including GST) by BSE for non- compliance under Regulation 29(2)/(3) of the SEBI	The provisions is not willful on the part of Company and advised to henceforth ensure complianc e requireme nts minutely	-

								(LODR) Regulations, 2015 relating to delay in prior intimation of Board Meeting for the month of August 2025, which has been duly paid within the prescribed time.		
2	Filing of Cash Flow statements on Half Yearly Basis	33	Late submission of financial results	Stock Exchange	Fine	The Company has been levied a penalty of Rs. 47,200	47,200	The Company has been levied a penalty of Rs. 47,200 (including GST) by BSE for non-compliance with Regulation 33 and Regulation 23(9) of the SEBI (LODR)	The provisions is not wilful on the part of Company and advised to henceforth ensure compliance requirements minutely	-

								Regulations , 2015 pertaining to late submission of financial results (including standalone cash flow statement) for September 2025 and non-compliance in disclosure of related party transactions , which has been duly paid within the prescribed time.		
--	--	--	--	--	--	--	--	---	--	--

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)	Compliance Requirement (Regulations/ circulars/ guidelines	Details of violation / deviations and actions	Remedial actions, if any, taken by the listed	Comments of the PCS on the Actions taken by the listed entity
------	---	--	---	---	---

		including specific clause)	taken / penalty imposed, if any, on the listed entity	entity	
1	-	-	-	-	-

Further, we hereby report that, during the Review Period the compliance status of the listed entity is appended below;

Sr. No.	Particulars	Compliance Status (Yes/NO/NA)	Observations/Remarks by PCS
1.	<p><u>Secretarial Standards:</u></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><u>Adoption and timely updation of the Policies:</u></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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	YES YES	NIL NIL
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Listed entity is maintaining a functional website 	YES YES	NIL

	<ul style="list-style-type: none"> 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	NIL NIL
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	YES	NIL
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>a. Identification of material subsidiary companies</p> <p>b. Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA NA	NIL NIL
6.	<p><u>Preservation of Documents:</u></p> <p>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.</p>	YES	NIL
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	YES	NIL
8.	<p><u>Related Party Transactions:</u></p> <p>a. The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p>	NA	NA

	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	NA	NA
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	NIL
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	NIL
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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 hereunder	NO	<ul style="list-style-type: none"> The Company has been levied a penalty of Rs. 11,800 (including GST) by BSE for non-compliance under Regulation 29(2)/(3) of the SEBI (LODR) Regulations, 2015 relating to delay in prior intimation of Board Meeting for the month of August 2025, which has been duly paid within the prescribed time. The Company has

			<p>been levied a penalty of Rs. 47,200 (including GST) by BSE for non-compliance with Regulation 33 and Regulation 23(9) of the SEBI (LODR) Regulations, 2015 pertaining to late submission of financial results (including standalone cash flow statement) for September 2025 and non-compliance in disclosure of related party transactions, which has been duly paid within the prescribed time.</p>
12.	<p>*Additional Non-Compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.</p>	YES	NIL

Other observations:

- Pursuant to Section 134 of the Companies Act, 2013 the Financial Statements of the Company must be signed by any two Directors (one of whom shall be the Managing Director), the Chief Executive Officer, the Chief Financial Officer and the Company

Secretary of the Company, wherever they are appointed. It is observed that the CFO of the Company hasn't signed the financials of the Company.

- The Company had received a Proclamation of Sale issued by the Commercial Court in respect of The Cotton Corporation of India Ltd. vs. Pasari Spinning Mills Ltd. & its Managing Director; however, the said sale proceedings were subsequently stayed by the Hon'ble Court through a stay order.
- Company has received an email from BSE seeking waiver of fines. However, the Company has not yet made any application for the same.

Date: 29th May, 2026
Place: Bangalore
UDIN: F009159H000528832

for Vinay & Ashwini
Company Secretaries

Belagodu
Lakshmikant
hraj setty
vinay

Digitally signed
by Belagodu
LakshmiKantra
j setty vinay

Vinay B L
M. No. F9159, CP. No. 10760
PR No:6327/2024