



**SURABHI AGRAWAL & ASSOCIATES**  
**PRACTICING COMPANY SECRETARY**

Office No. 56, 4<sup>th</sup> Floor, Dawa Bazaar, R.N.T. Marg, Indore (M.P.) - 452001  
pcs.surabhiagrawal@gmail.com +91-9993977785

**SECRETARIAL COMPLIANCE REPORT**  
**OF**  
**CHOKSI LABORATORIES LIMITED (CIN:L85195MP1993PLC007471)**  
**FOR THE YEAR ENDED MARCH 31, 2024**

We Surabhi Agrawal & Associates, Proprietor being CS Surabhi Agrawal, Company Secretary in practice from Indore have examined:

- a) all the documents and records made available to us and explanation provided **CHOKSI LABORATORIES LIMITED** ("the listed entity") having CIN: **L85195MP1993PLC007471**,
- 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 clarification,

For the year ended **March 31, 2024** ("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 (Regulations) 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 under period of 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 as the Company has not bought back any of its securities during the year under review**;
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 -**Not Applicable under period of review**;
- f) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; **Not Applicable under period of review**;
- g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations; **Not Applicable under period of review**;





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- h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable under period of review;**
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- k) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 as amended from time to time. **Not Applicable under period of review;**
- l) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investments and External Commercial Borrowings and circulars/ guidelines issued thereunder; **Not Applicable under period of review;**

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 there under, except in respect of matters specified below:

S N O	Compliance Requirement (Regulations /circulars/ guidelines Including specific clause)	Regulation/ Circular No.	Action Taken by	Type of Action Advisory / Clarification/ Fine/ Show Cause Notice/ Warning , etc.	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management-Response	Remark
NOT APPLICABLE									

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

S N O	Compliance Requirement (Regulations /circulars/ guidelines	Regulation/ Circular No.	Action Taken by	Type of Action Advisory / Clarification/	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management-Response	Remark
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Including specific clause)			Fine/Show Cause Notice/ Warning, etc.					
NOT APPLICABLE								

I. 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
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).	YES	NA
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li></ul>	YES	NA
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of</li></ul>	YES	NA





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	<p>the documents/ information under a separate section on the website</p> <ul style="list-style-type: none"><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li></ul>		
4	<p>Disqualification of Director:</p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	YES	NA
5	<p>Details related to subsidiaries of listed entity have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	NA
6	<p>Preservation of Documents:</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 <b>SEBI LODR Regulations, 2015</b></p>	YES	NA
7	<p>Performance Evaluation:</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	NA





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8	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(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</p>	YES	NA
9	<p>Disclosure of events or information:</p> <p>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.</p>	YES	NA
10	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI(Prohibition of Insider Trading) Regulations, 2015</p>	YES	NA
11	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>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 thereunder.</p>	NA	NA
12	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries</p>	NA	NA





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	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.		
13	Additional Non-compliances, if any: any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	NA

**We further report that:**

1. The resignation of Mr. Ratnesh Sadoriya (DIN: 08146570) from his position as Independent Director, effective May 5, 2023, due to other preoccupations, was duly noted and accepted.
2. The office of Independent director of Late Mr. Nanoo Krishna Mani (DIN: 02783996) was vacated due to his sudden demise on January 8, 2024. The casual vacancy arose due to his demise was filled by Mrs. Prachi Mantri (DIN: 10491114).
3. Mrs. Meenaxi Patidar (DIN: 10206356) was appointed as an Additional Independent Director of the Company during a duly convened Board Meeting held on July 5, 2023. Her designation was subsequently changed from Additional Independent Director to Independent Director during the Annual General Meeting held on September 27, 2023.
4. Mrs. Prachi Mantri (DIN: 10491114) was appointed as an Additional Independent Director during a duly convened Board Meeting held on March 27, 2024. Her position as an Independent Director was further regularized through Postal Ballot/e-voting.
5. Mrs. Abha Shastri (DIN: 00065772) was appointed as an Additional Independent Director during a duly convened Board Meeting held on March 27, 2024, with her appointment becoming effective on April 1, 2024. Her position as an Independent Director was subsequently regularized through Postal Ballot/e-voting.
6. The resignation of Mr. Yash Gupta (PAN: BBMPG2662J) from the position of Company Secretary and Compliance Officer, effective July 5, 2024, was duly noted and accepted. Subsequently, Mr. Prakhar Dubey (PAN: GALPD0898E) was appointed as the Company Secretary during the same Board Meeting held on July 5, 2024.
7. The retirement of Mr. Sudarshan Shastri (DIN: 00155105) from his position as Independent Director, effective at the close of business on March 31, 2024, due to the completion of his term, was duly noted and accepted during the Board Meeting held on March 27, 2024.

**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.





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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.

Place: Indore  
Date: May 25, 2024

For Surabhi Agrawal & Associates



CS Surabhi Agrawal

Practicing Company Secretary

M. No. A56574 C.P. No. 23696

FRN: S2023MP904400

UDIN: A056574F000450154

Peer Review: Peer Review No.- 5654/2024