

Ref. No.: LASA/SE/25-26/012  
Wednesday May 28, 2025

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| <b>To,</b><br><b>Corporate Services Department</b><br><b>BSE Limited</b><br><b>Phiroze Jeejeebhoy Towers,</b><br><b>Dalal Street,</b><br><b>Mumbai – 400 001.</b><br><b>BSE CODE –540702</b> | <b>To,</b><br><b>Corporate Services Department</b><br><b>National Stock Exchange of India Limited</b><br><b>“Exchange Plaza”, Plot No. C/1,</b><br><b>G Block Bandra-Kurla Complex,</b><br><b>Bandra (E), Mumbai – 400 051.</b><br><b>NSE CODE: LASA</b> |
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Dear Sir/Madam,

**Subject: Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2025.**

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 Dated 8<sup>th</sup> February, 2019, please find enclosed copy of the Annual Secretarial Compliance Report dated May 27, 2025 issued by Shivam Sharma and Associates, for the financial year 2024-25.

This is for your information and record.

**Thanking You**  
**Yours Truly**  
**For Lasa Supergenerics Limited**

**Mitti Jain**  
**Company Secretary and Compliance Officer**



**SECRETARIAL COMPLIANCE REPORT OF LASA SUPERGENERICS LIMITED FOR THE YEAR  
ENDED 31<sup>ST</sup> MARCH, 2025.**

To,

**Lasa Supergenerics Limited**

**Reg. Office:** Plot no. C-4, C-4/1, MIDC Lote Parshuram  
Industrial Area, Tal -Khed, Khed Ratnagiri MH 415722.

I Shivam Sharma have examined:

- all the documents and records made available to us and explanation provided by **Lasa Supergenerics Limited** (“the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2025 (“Review Period”) in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;  
**(Not applicable to the Company during the review period)**



- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **(Not applicable to the Company during the review period)**

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:

| Sr. No | Compliance Requirement (Regulations/circulars/ guidelines including specific clause) | Regulation/ Circular No. | Dev iations | Actio n Taken by | Type of Action | Details of Violation   | Fine Amount  | Observati ons/ Remarks of the Practicing Company Secretary  | Manage ment Response   | Remark |
|--------|--|--------------------------|-------------|------------------|----------------|--|--|---|--|--------|
| 1.     | The Composition of Board of the Listed Company                                       | Regulation 17(1)         | --          | BSE and NSE      | Imposed Fine   | Non-compliance with the requirements pertaining to the composition of the Board including failure during the | Both BSE and NSE imposed a fine on the Company amounting of Rs.3,95,300/- each inclusive of GST. | The Company has appointed Mr. Umesh Pawar Executive Director in the Board Meeting held on 08.03.2024. and | The Company has appointed Mr. Umesh Pawar in the Board Meeting held on 08.03.02024 and | --     |



**ShivamSharma & Associates**  
**Company Secretaries**  
**B.Com, ACS**

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|----|--|---|----|-------------|--------------|--|--|--|---|----|
|    |  |   |    |             |              | quarter ended 31.03.2024   |  | the Company has paid the fine levied by the BSE for Rs.3,95,300/- and by the NSE Rs.3,95,300/-.  | complied with the applicable provision. And paid the imposed fine.                            |    |
| 2. | Regulation 23(9) with respect to submission of disclosure of Related party transaction   | Regulation 23(9) of SEBI (LODR) Regulations, 2015         | -- | BSE and NSE | Imposed Fine | The Company inadvertently missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for quarter and year ended 31.03.2024. | Both BSE and NSE imposed a fine on the Company amounting to Rs. 5,900/- each inclusive of GST. | The Company inadvertently missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for quarter and year ended 31.03.2024. | The Company has filed Disclosure for quarter and year ended 31.03.2024 and paid imposed fine. | -- |
| 3. | File the Certificates of Structured Digital Database (SDD) and pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board | Regulation 3(5) and 3(6) of Securities and Exchange Board | -- | --          | --           | The Company inadvertently missed to Complied the provisions of Regulation  | --   | The Company inadvertently missed to Complied the provisions of Regulation  | The Company has filed SDD as per the provisions of Regulation 3(5)                            | -- |



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**Company Secretaries**  
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| of India (Prohibition of Insider Trading) Regulations, 2015 within 21 days from the end of Quarter. | of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) |  |  |  |  | n 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024. |  | n 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024. | and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024, on 29.04.2024. |  |
|---|---|--|--|--|--|---|--|---|---|--|

(b) The listed entity has taken the following actions to comply with the observations made 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                                  | Remark |
|--------|---|---------------------------------|------------|-----------------|----------------|--|-------------|--|--|--------|
| 1.     | a. The listed entity shall submit audited standalone financial results for the financial year, within sixty | Regulation 33 (3) (d) and 23(9) | --         | BSE and NSE     | Imposed Fine   | Approval of Financial Results along with Auditor's | Rs.118800/- | The Company has been complied the provision              | There was a delay in submission of Financial Results | -      |



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**Company Secretaries**  
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|    | days from the end of the financial year along with the audit report.<br><br>b. The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website. |                  |    |             |              | Report for quarter and financial year ended March 31 2023 after 60 days and submit to the stock exchanges disclosures of related party transactions after the due date. |             | ns with the fine levied by the BSE for Rs.59,400/- and by the NSE Rs.59,400/- .   | due to consolidation of the company acquired through amalgamation which was duly informed to exchanges in advance.            |   |
| 2. | The Composition of Board of the Listed Company   | Regulation 17(1) | -- | BSE and NSE | Imposed Fine | Non-compliance with the requirements pertaining to the composition of the Board including failure during the quarter ended 31.12.2023                                   | Rs.59,000/- | The Company has appointed Mr. Umesh Pawar Executive Director in the Board Meeting held on 08.03.2024. and the Company has paid the fine | The Company has appointed Mr. Umesh Pawar in the Board Meeting held on 08.03.2024 and complied with the applicable provision. | - |



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|--|--|--|--|--|--|--|--|---|--|--|
|  |  |  |  |  |  |  |  | levied by<br>the BSE<br>for<br>Rs.29,50<br>0/- and<br>by the<br>NSE<br>Rs.29,50<br>0/-. |  |  |
|--|--|--|--|--|--|--|--|---|--|--|

- i. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

| <b>Sr. No.</b> | <b>Particulars</b>   | <b>Compliance status (Yes/ No/ NA)</b> | <b>Observations/ Remarks by PCS*</b> |
|----------------|--|--|--------------------------------------|
| 1              | <b><u>Secretarial Standards:</u></b><br><br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.  | Yes                                    | None                                 |
| 2              | <b><u>Adoption and timely updation of the Policies:</u></b> <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 have been reviewed &amp; updated on time as per the regulations /circulars/ guidelines issued by SEBI.</li></ul> | Yes                                    | None                                 |
| 3              | <b><u>Maintenance and disclosures on Website:</u></b>  |  |                                      |



|   |   |     |   |
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|   | <ul style="list-style-type: none"><li>• The Listed entity is maintaining a functional website.</li><li>• Timely dissemination of the documents/ information under a separate section on the website.</li><li>• 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.</li></ul> | Yes | None                                      |
| 4 | <b><u>Disqualification of Director:</u></b><br><br>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.   | Yes | None                                      |
| 5 | <b><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></b> <ul style="list-style-type: none"><li>• Identification of material subsidiary companies</li><li>• Requirements with respect to disclosure of material as well as other subsidiaries.</li></ul>  | NA  | The Company does not have any subsidiary. |
| 6 | <b><u>Preservation of Documents:</u></b><br><br>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 | <b><u>Performance Evaluation:</u></b><br><br>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   | Yes | None                                      |



|    |   |   |  |
|----|---|---|--|
|    | Regulations.  |   |  |
| 8  | <p><b><u>Related Party Transactions:</u></b></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<br><br>NA   | None<br><br>Prior approval of Audit Committee was obtained for all the Related Party Transactions. |
| 9  | <p><b><u>Disclosure of events or information:</u></b></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   | None   |
| 10 | <p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>   | Yes   | None   |
| 11 | <p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></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>                | Yes, except observations as mentioned in the remark column. | Details in above mentioned in the Point no. "A".   |
| 12 | <p><b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b></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. | NA | None  |
| 13 | <b><u>Additional non-compliances, if any:</u></b><br><br>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.  | NA | No additional non-compliance was observed except Details in above mentioned in the Point no. "A". and the Company obtained Shareholders approval on 26.06.2024 after three months from the date of appointment of a director if appointed by the Board. |

**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 certify 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.

5 This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to financial year ended March 31, 2025.

6 The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on random test basis.

7. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on the random test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.

**Thanking You**  
**For Shivam Sharma & Associates**  
**Company Secretaries**

SHIVAM  
SHARMA

Digitally signed  
by SHIVAM  
SHARMA  
Date: 2025.05.27  
16:22:43 +05'30'

**Shivam Sharma**  
**(Proprietor)**  
**M. No.: A35727, CP. No.: 16558**  
**Peer Review Certificate No.: 1811/2022**  
**UDIN: A035727G000457491**  
**Place: Mumbai**  
**Date: 27.05.2025**