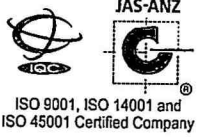




DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555



Registered Office : 7B Shreelekha, 7th Floor, 42A Park Street, Kolkata 700 016, India
Tel : +91(33) 2229-5735, 2229-7995, 4600-2601, 4600-2602
E-mail : info@dhpindia.com

Ref : 19(B)(B)/3114/

14/04/2026

To
The General Manager /Asst. General Manager - Deptt. Of Corporate Services,
Bombay Stock Exchange Ltd., [Securities Code : 531306]
25, P. J. Towers, Dalal Street, Mumbai - 400 001.

Dear Sir,

Re : DHP INDIA LIMITED [ISIN:INE590D01016, Securities Code BSE : 531306]
Subject : Sending of Annual Secretarial Compliance Report from a Practicing Company Secretary as per Regulation 24A (newly notified by SEBI) of Year ended 31/03/2026

We are sending herewith the Annual Secretarial Compliance Report as per Regulation 24A of SEBI (LODR) Regulations 2015, duly verified and signed by a Practicing Company Secretary for the year ended 31/03/2026 mentioned their UDIN also.

Now, we are sending the attached Annual Secretarial Compliance Report as per Regulation 24A.


Kindly acknowledge the same.

Thanking You,

Place : KOLKATA
Dated : 14/04/2026



FOR DHP INDIA LIMITED


(CA Ashok Kumar Singh)
Chief Financial Officer

Enclosed : As stated above

SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

ANNUAL SECRETARIAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”
FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026
[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

To

The Members

DHP INDIA LIMITED [CIN : L65921WB1991PLC051555]

Regd. Office : 7B, Shreelekha, 7th Floor, 42A, Park Street, Kolkata-700016.

We *M/s. Sushil Tiwari & Associates, Practicing Companies Secretaries* have examined :-

- All the documents and records made available to us and explanation provided by DHP INDIA LIMITED (“the listed entity”),
- The filing/submission 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 31st March, 2026 (“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 (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 :-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; **(Applicable to the Company)**
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not applicable to the Company during the Review Period);**
- Securities and Exchange Board of India (Substantial Acquisitions of Shares and Takeovers) Regulations, 2011; **(Applicable to the Company)**
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not applicable to the Company during the Review Period);**

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SUSHIL TIWARI & ASSOCIATES

Company Secretaries

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: 2 :

SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”
FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026
[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

Continuation of the specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include :-

- (e) Securities and Exchange Board of India (Share Based Employee Benefit) Regulations, 2014 (**Not applicable to the Company during the Review Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**Not applicable to the Company during the Review Period**);
- (g) 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**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (**Applicable to the Company**)
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; (**Applicable to the Company**)
- (j) The Companies Act, 2013 (the Act) and the rules made thereunder; (**Applicable to the Company**)
- (k) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (l) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; (**Applicable to the Company**)
- (m) Circular issued by National Financial Reporting Authority vide Circular No.NF-25013/3/2025-NFRA dated 07/01/2026 related to Effective Communication between Statutory Auditors, Those Charged with Governance, including Audit Committees in line of requirements of the Companies Act, 2013.
- (n) **And Other Regulations as applicable and circulars/guidelines issued thereunder;**

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SUSHIL TIWARI & ASSOCIATES

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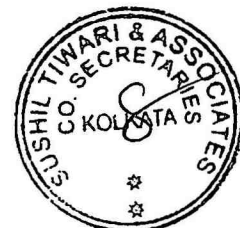
SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED” FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026 [As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

And based on the above examination. We hereby report that, during the Review Period The disclosures of Annual Secretariat Compliance Report are as below :-

(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 (Advisory/Circular/Fin/Show cause Notice /Warning etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	2	3	4	5	6	7	8	9	10	11
1	Filing of Annual Secretarial Compliance Report of March 2024 as per SEBI(LODR) Reg.24A in “PDF Format” as well as “XBRL Format” both within due date 30/05/2024	Regulation 24A – March 2024 of SEBI (LODR)	“XBRL Format” filed on 12/04/24 but “PDF format escaped and filed late on 14/06/24a 15 days delay	BSE Limited As and when information received by the Company on same day filed “PDF” format on 14/06/2024	Fine raised	15 days delay for filing of “PDF” format	Rs.30000 plus GST i.e. Rs.35400	Company filed SOP waiver on 02/07/24 and same rejected without any speaking order on 18/02/26 and Company again filed Second Review of waiver on same day 18/02/26. BSE did not response and Finally on 25/03/26 the Company pay the fine under Protest	Company pay the fine under Protest on 25/03/26 and also filed Second review application with BSE	No outstanding fine as on date even refund may be available.
2	Filing of Annual Secretarial Compliance Report of March 2025 as per SEBI(LODR) Reg.24A in “XBRL Format” as well as “XBRL Format” both within due date 01/06/2025	Regulation 24A – March 2025 of SEBI (LODR)	“PDF Format” filed on 11/04/25 but “XBRL format” not filed within 01/06/25 due to XBRL software itself by BSE on 20/05/25	BSE Limited As and when information received by the Company on same day filed “XBRL” format on 30/06/2025	Fine raised	29 days delay for filing of “XBRL” format” even BSE delay 50 days to launched XBRL Software.	Rs.58000 plus GST i.e. Rs.68440	Company filed SOP waiver on 15/07/25 and same rejected without any speaking order on 18/11/25 and Company filed Second Review on 18/11/25. BSE did not response and Finally on 25/03/26 the Company pay the fine under Protest	Company pay the fine under Protest on 25/03/26 and also filed Second review application with BSE	No outstanding fine as on date even refund may be available.

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SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

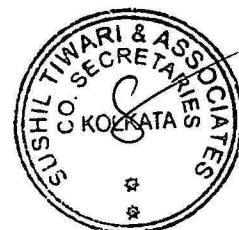
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CONTINUATION OF SECRETARIAL ANNUAL COMPLIANCE REPORT OF "DHP INDIA LIMITED" 31/03/2026

(a) Continuation of The listed entity has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below :-

1	2	3	4	5	6	7	8	9	10	11
3	Maintaining of Adequate Number of Independent Director in Audit Committees as per SEBI (LODR) Reg.19(1)/(2) of June'2025 Qtr.	Regulation 19(1)/(2) – June 2025 of SEBI (LODR)	1 Independent Director Mr.Surajit Raha who is a member of Audit Committee retire on 31/03/25 and same person re-appointed on 29/05/2025 – This is a procedural aspect but BSE taken that period from retirement to re-appointment date is a default and arrived 59 days default	BSE Limited Within the quarter Company re-appointed to the same person as Independent Director but the procedural time BSE taken as default which is beyond the Company	Fine raised	59 days delay from the date of retirement to date of re-appointment of same person considered as default even which is a procedural aspect.	Rs.118000 plus GST i.e. Rs.139240	Company filed SOP waiver on 01/09/25 and same rejected without any speaking order on 24/03/26 and Company again filed Second Review of waiver on same day 24/03/26. BSE did not response and Finally on 25/03/26 the Company pay the fine under Protest	Company pay the fine under Protest on 25/03/26 and also filed Second review application with BSE	No outstanding fine as on date even refund may be available.
4	Publication of Audited Annual Result of March'2015 within 01/06/2015 as per Reg.33 of SEBI(LODR)	Regulation 33 – March 2015 of SEBI (LODR)	Earlier 90 days time to allow this year 2015 BSE revised time 60 days without any advance intimation and in 2015 CARO report also adopted. Company Published result on 29/06/2015	BSE LIMITED Company filed Result on 29/06/2015 and requested to BSE that this is 1 st Yr to implement CARO and also 1 st Yr to reduced time frame from 90 to 60 days, so please considered, but BSE not responded even 11 years lapse.	Fine raised	29 days delay for of 2015 year for publication of delayed accounts considered	Rs.175000 plus GST i.e. Rs.206500	Company filed SOP waiver on 26/06/2015 and same was not yet informed by BSE whether the above fine is waived, reduced or rejected even 11 years lapse. No action taken by BSE and in their ledger shows Fine BSE did not response any letter and Finally on 25/03/26 the Company pay the fine under Protest	Company pay the fine under Protest on 25/03/26 and also filed Second review application with BSE	No outstanding fine as on date even refund may be available.

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SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

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SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”
FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026
[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

Continuation of The disclosures of Annual Secretariat Compliance Report are as below :-

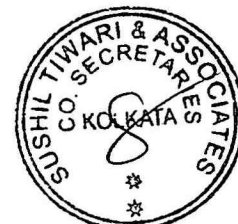
(b) The listed entity has taken the following actions to comply with the observations made in previous reports : NIL

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause	Regulation /Circular No.	Deviations	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	Remarks
	All Regulation/circular/guidelines complied	No such any irregularity	No any Deviation	No Action Taken	No Action Taken – NIL/Not Applicable	No any Violation	NIL	No need to any Remarks as all Regulation Complied	Not Applicable	NIL

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 by PCS
1	<u>Secretarial Standard</u> 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	NIL
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 conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI 	YES YES	NIL NIL

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SUSHIL TIWARI & ASSOCIATES

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SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”

FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026

[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

Continuation of based on the above examination. We hereby report that, during the Review Period :-

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS
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 of the website • 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 	YES YES YES	NIL NIL NIL
4	<u>Disqualification of Director :</u> None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013	YES	NIL
5	<u>To examine details related to Subsidiaries of listed entities :</u> <ul style="list-style-type: none"> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries 	NA NA	The listed entity has no such Subsidiaries
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	NIL
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 as prescribed in SEBI Regulations.	YES	NIL
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. (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 NA	NIL All RPT Transaction taken prior approval

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SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

: 7 :

SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”
FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026
[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

Continuation of based on the above examination. We hereby report that, during the Review Period :-

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations/Remarks by PCS
9	<u>Disclosure of events or information :</u> The listed entity has provided all the required disclosures(s) under Regulation 30 alongwith 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 thereunder.	YES	Some Fine under Protest paid by the Company reported as stated above
12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries :</u> 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 YES	NIL
13	<u>Additional Non-compliances, if any :</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA YES	NIL

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SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

: 8 :

SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”
FOR THE FINANCIAL YEAR ENDED : 31ST MARCH, 2026
[As per Regulation 24A of the SEBI (LODR) Regulations, 2015]

Continuation of disclosures of Annual Secretariat Compliance Report

We further, report that the listed entity is in compliance/ not in compliance with disclosure requirements of Employees Benefit Scheme Documents in terms of Regulation 46(2) (za) of the SEBI (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.

We hereby confirm that no observations made in any previous year under secretarial audit report and we also confirm that during the year no action taken by any regulatory/govt. body against the Company, its promoter, its director and its managerial personnel etc, except as stated above. Similarly the listed entity have no subsidiary companies. The Company have complied all rules, regulations and directions issued under aforesaid regulations during the Review Period.



31A, S. P. Mukherjee Road,
Kolkata - 700 025

The 13th day of April, 2026

UDIN: A006199H000082825

For SUSHIL TIWARI & ASSOCIATES
Company Secretaries

Sushil Tiwari
[SUSHIL TIWARI]
Proprietor

Membership No.ACS-6199 & Certificate of Practice No.1903
Peer Review Certificate No. 2249/2022