

Date: May 26, 2025

**BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001**

Security ID/ Code - ELNET /517477

Respected Sir/ Madam,

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2025.

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the company for the financial year ended March 31, 2025 issued by Mr. Rajapandian, Partner, M/s. R & RJ Associates, Practicing Company Secretaries.

This is for your information and records

Thanking You

**Yours Truly,
For ELNET Technologies Limited**

**Unnamalai
Thiagarajan**

Digitally signed by Unnamalai
Thiagarajan
Date: 2025.05.26 12:55:49 +05'30'

**Unnamalai Thiagarajan
Managing Director, DIN: 00203154**



R & RJ ASSOCIATES
Practicing Company Secretaries

No.52, Periyarpadhai,
Choolaimedu, Chennai - 600094
Tele: 044- 31356623
E-Mail: secretarial.randrj@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF ELNET TECHNOLOGIES LIMITED FOR THE
FINANCIAL YEAR ENDED 31.03.2025**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **ELNET TECHNOLOGIES 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 Report.

for the financial year ended 31st March, 2025 ("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 SEBI;

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

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 during the Audit Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non - Convertible Securities) Regulations, 2021(**Not applicable during the Audit Period**)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) other regulations as applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:





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(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. 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 (PCS)	Management Response	Remarks
As per Annexure										

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

Sr. No	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31.03.2024	Compliance Requirement (Regulations/ circulars/ guidelines including 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.	Policy for determination of materiality of events or information and Board Diversity Policy is not in place	Policy for determination of materiality of events or information board diversity policy in not in place	Regulation 30 of SEBI (LODR) Regulations, 2015	NA	The Board has placed policy for determination of materiality of events or information board diversity policy.	Complied





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(c) 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.	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	None
2.	Adoption and timely updation of the Policies: <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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	None
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The listed entity is maintaining a functional website.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 redirects to the relevant document(s)/section of the website.	Yes	None
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None





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5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA	NA
6.	Preservation of Documents: 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.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	None
8.	Related Party Transactions: (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.	(a) Yes (b)	None (b) Please refer point no.8(a)
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	None





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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	None
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 actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NO Yes	Please refer Annexure
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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	No such event
13.	Additional non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	No such non-compliance

Observations/Remarks by PCS are mandatory if the compliance status is provided as 'No' or 'NA'





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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.

Date: 26.05.2025
Place: Chennai

For R & R J Associates
Practicing Company Secretaries
Peer Review Certi. No.: 5170/2023


CS Rajapandian
Partner

M. No. A44502 | C. P No.20953
UDIN: A044502G000435563





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Annexure

1.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation 17(1) Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	Regulation 18(1) Non-compliance with the constitution of audit committee
2.	Regulation/ Circular No.	SEBI/HO/CFD/PoD2/CIR/P /2023/ 120 dated July 11, 2023	SEBI/HO/CFD/PoD2/CIR/P /2023/ 120 dated July 11, 2023
3.	Deviations	Failed to appoint woman director	Failed to constitute of audit committee with proper composition of directors
4.	Action Taken by	BSE Limited	BSE Limited
5.	Type of Action	Penalty	Penalty
6.	Details of Violation	Failure to appoint woman director	Failed to constitute of audit committee with proper composition of directors
7.	Fine Amount	Rs.1,29,800/-	Rs.89,680/-
8.	Observations / Remarks of the Practicing Company Secretary (PCS)	The Company has paid the fine levied within the timelines and the board has appointed Mrs. Madura Ganesh (DIN: 02456676) as Additional Independent Director.	The Company has paid the fine levied within the timelines and the board has appointed Mrs. Madura Ganesh (DIN: 02456676) as Additional Independent Director and reconstituted the Audit Committee.
9.	Management Response	The Company has paid the fine levied within the timelines and the board has appointed Mrs. Madura Ganesh (DIN: 02456676) as Additional Independent Director.	The Company has paid the fine levied within the timelines and the board has appointed Mrs. Madura Ganesh (DIN: 02456676) as Additional Independent Director and reconstituted the Audit Committee.
10.	Remarks	NA	NA

