

# PRIMA INDUSTRIES LTD.



CORPORATE & REGD. OFFICE  
Industrial Development Area  
Muppathadam P. O., Edayar, Cochin - 683 110  
Kerala State, India  
Tel: 91-484-2551533 (4 Lines)  
CIN: L15142KL 1994PLC008368  
E-mail: [primagroupcompanies@gmail.com](mailto:primagroupcompanies@gmail.com)  
[www.primaindustries.in](http://www.primaindustries.in)

**Ref: PIL/SEC/2026-27/18**

28<sup>th</sup> May, 2026

**Stock Code: BSE: 531246**  
**Listed Equity Shares ISIN: INE723N01012**  
**Unlisted Preference Shares(S-II) ISIN: INE723N04016**  
**Unlisted Preference Shares(S-III) ISIN: INE723N04024**

To,  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai- 400001

**Sub: Annual Secretarial Compliance Report for the Financial year ended 31<sup>st</sup> March, 2026.**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial year ended 31<sup>st</sup> March, 2026, issued by M/s. BVR & Associates Company Secretaries LLP, Practicing Company Secretaries, the Secretarial Auditors of the Company.

Kindly take the same on record.

Thanking you,

Yours faithfully,  
For **Prima Industries Limited**

**Nayana V B**  
Company Secretary and Compliance Officer  
Membership No. A76822

**Encl:** As above

**ANNUAL SECRETARIAL COMPLIANCE REPORT**

*[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

**Secretarial Compliance Report of PRIMA INDUSTRIES LIMITED for the Financial year ended 31<sup>st</sup> March, 2026.**

We BVR & Associates Company Secretaries LLP, have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by PRIMA INDUSTRIES LIMITED (CIN: L15142KL1994PLC008368), having its Registered Office at Door No. V-679/C, Industrial Development Area Muppathadam, Edayar Cochin-683110. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

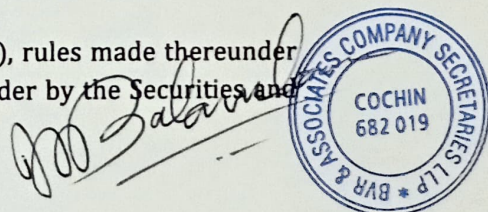
Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We, BVR & Associates Company Secretaries LLP, have examined:

- a) all the documents and records made available to us and explanations provided by PRIMA INDUSTRIES LIMITED.
- 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 31/03/2026 ("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");



**Corporate Office :** Kousthubham, # 33/1797, Manakodam Rd, Perandoor, Elamakkara, Kochi, Kerala - 682 026  
Ph : +91 98956 32786, E-mail: yogi@directus.co.in

**Registered Office:** Swastika, First Floor, Chitteth House, P C Road, Vytilla P.O., Cochin - 682 019  
Ph: +91 98956 31786, E-mail : balu@directus.co.in

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 (to the extent applicable);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018(to the extent applicable);
- f) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- g) 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;
- h) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- i) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- j) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations,2013;

The following Regulations are applicable to the listed entity during the period under review:

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015.
- c) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018.
- c) Securities and Exchange Board of India (Registrars to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with the client.

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.

*Balamban*



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 Practising Company Secretary | Observations made in the secretarial compliance report for the year ended | Comments of the practicing company secretary on the actions taken by the listed entity | Management Response | Remarks |
|----------------|---------------------------------------------------------------------------------------|--------------------------|------------|-----------------|----------------|----------------------|-------------|-----------------------------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------|---------------------|---------|
| Not Applicable |                                                                                       |                          |            |                 |                |                      |             |                                                           |                                                                           |                                                                                        |                     |         |

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

No event relating to resignation of auditor has occurred during the review period; hence, this clause is not applicable.

We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

| Sr No. | Particulars                                                                                                                                                                                                                                                                | Compliance Status (Yes/No/NA) | Observations/Remarks by PCS |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-----------------------------|
| 1.     | <b>Secretarial Standards:</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 | Yes                           | NIL                         |



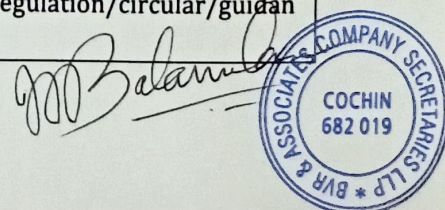


|    |                                                                                                                                                                                                                                                                                                                                                                                             |                      |                                                                     |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|
|    | <p>a) Identification of material subsidiary companies</p> <p>b) Disclosure requirement of material as well as other subsidiaries</p>                                                                                                                                                                                                                                                        | <p>NA</p> <p>NA</p>  | <p>The Listed Entity does not have any subsidiary.</p>              |
| 6. | <p><b>Preservation of Documents:</b></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>                                                                                                           | <p>Yes</p>           | <p>NIL</p>                                                          |
| 7. | <p><b>Performance Evaluation:</b></p> <p>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.</p>                                                                                                                                | <p>Yes</p>           | <p>NIL</p>                                                          |
| 8. | <p><b>Related Party Transactions:</b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.</p> | <p>Yes</p> <p>NA</p> | <p>Prior approval was taken for all Related Party Transactions.</p> |

*M Balam*

COCHIN  
682 019  
BVR & ASSOCIATES LLP \* COMPANY SECRETARIES

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |     |                                                                                                                                                                                                                                         |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.  | <b>Disclosure of events or information:</b><br><br>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. | <b>Prohibition of Insider Trading:</b><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.                                                                                                                                                                                                                                                                                                     | Yes | NIL                                                                                                                                                                                                                                     |
| 11. | <b>Actions taken by SEBI or Stock Exchange(s), if any:</b><br><br>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 except as provided under.                                                                            | NA  | As informed by the Management, no actions were taken against the Company/its promoters/ directors/subsidiaries either by SEBI or by BSE under SEBI Regulations and circular/guidelines issued there under during the year under review. |
| 12. | <b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b><br>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(is) 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  | There was no resignation of Statutory Auditors from the Company.                                                                                                                                                                        |
| 13. | <b>Additional Non-compliances, if any:</b><br><br>No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.                                                                                                                                                                                                                                                                                                                               | Yes | No additional non-compliance was observed for any SEBI regulation/circular/guidan                                                                                                                                                       |



|  |  |  |                                            |
|--|--|--|--------------------------------------------|
|  |  |  | ce note etc. during the year under review. |
|--|--|--|--------------------------------------------|

#### 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 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.

**N BALASUBRAMANIAN**

Designated Partner

BVR & Associates Company Secretaries LLP

"Kousthubham", Door No: 33/1797

Manakodam, Rd., Perandoor, Elamakkal

Kochi-682 026, Kerala.

C P No: 4996, FCS 6439, LLP IN AAE-7079



Place:- Cochin

Date:- 28.05.2026

**CS N BALASUBRAMANIAN**

**DESIGNATED PARTNER**

**BVR & Associates Company Secretaries LLP**

**FCS No:6439**

**C P No.:4996**

**UDIN: F006439H000522891**

**Peer Review No: P2010KE020500**