



PRIME INDUSTRIES LIMITED

CIN : L15490PB1992PLC012662

Regd. Office : Master Chambers, SCO-19,
Feroze Gandhi Market, Ludhiana-141001. Punjab

TEL.: 0161-5043500

E-mail : prime_indust@yahoo.com

Website : www.primeindustrieslimited.com

To,
The Manager (Listing)
BSE Limited,
Floor 25, P.J. Towers,
Dalal Street, Mumbai-400001

Dated: 30-05-2026

SCRIP Code No.: 519299, PRIMIND

SUB: Submission of Annual Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) regulations, 2015

Dear Sir / Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we herewith enclose the Annual Secretarial Compliance Report received from the Practicing Company Secretary i.e. M/s. Pooja M Kohli & Associates in respect of the Company under the said regulation for the year ended March 31st March, 2026.

Kindly take the above information on records please.

Thanking You.

Yours Faithfully

For Prime Industries Limited

Diksha
Digitally signed
by Diksha Tiwari
Date: 2026.05.30
14:23:42 +05'30'

Diksha Tiwari

Company Secretary and Compliance Officer

ACS 99714

Enclosed as above



POOJA M. KOHLI & ASSOCIATES

655, Street No.4, Preet Nagar, Dugri, Ludhiana-141013 (Punjab)

Cell: 98784-32424

Email: cspoojamkohli@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT OF PRIME INDUSTRIES LIMITED

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

(Pursuant to reg. 24A of the SEBI (Listing Obligations and Disclosure Requirements) Reg. 2015)

I, Pooja M Kohli, Proprietor of M/s Pooja M Kohli & Associates, Company Secretaries in whole time practice have examined:

- All the documents and records made available to us and explanation provided by Prime Industries 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 Report.

For the financial year ended 31st March, 2026 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 SEBI;

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

- Securities and Exchange Board of India (LODR) 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;
- Other regulations as applicable.

along with circulars/ guidelines issued thereunder.

and based on the above examination, I 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:

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 (PCS)	Management Response	Remarks
1.	Non-submission of the Annual Report within the period prescribed under Regulation 34 of SEBI (LODR), Regulations, 2015	Regulation 34 of SEBI (LODR), Regulations, 2015	Annual report was required to be submitted on the date of dispatch	BSE	Penalty	Annual report was submitted with delay of one day	2360/-	The said non-compliance was observed during the course of preparation of Annual Secretarial Compliance Report as well as from the mails received from BSE.	Despatch date confirmed by RTA after working hours due to some inadvertent technical issue faced by RTA. Therefore, it was construed as delay in submission of Annual	Delayed Complied

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[Signature]
Pooja M. Kohli & Associates
FCS-7255
C.R.No.-14836
Ludhiana



POOJA M. KOHLI & ASSOCIATES

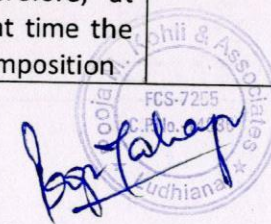
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					Report. However, the company has filed the Annual Report on next day after getting confirmation from RTA.					
2.	Non-compliance with the requirements pertaining to the composition of the Board of Directors	Regulation 17(1) of SEBI (LODR), Regulations, 2015	The Composition of Board of Directors was not per Regulation 17(1) of SEBI	BSE	Penalty	The ratio of Independent vis-à-vis Non-Independent Directors was not as per the Regulation 17(1) of the of SEBI	3,00,900/-	The said non-compliance was observed during the course of preparation of Annual Secretarial Compliance Report as well as from	Due to ongoing Restructuring of the company, Mr. Rama Nand Gupta was appointed as Whole-Time Director, therefore, at that time the composition	Complied as on Date

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			(LODR), Regulations, 2015		(LODR), Regulations, 2015		the mails received from BSE.	of Board of Directors was not in accordance with the Regulation 17(1) of SEBI (LODR) Regulations, 2015. However, due to the resignation of Saket Aggarwal, as Non- Executive Director, the composition of Board of Directors is complied, as on Date. The Company has also paid the penalty for the Non- Compliance.	
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3.	Non-compliance with the requirement related to filling of Casual Vacancy in the office of Chief Financial officer as per Regulation 26A(2) of SEBI (LODR), Regulations, 2015	Regulation 26A(2) of SEBI (LODR), Regulations, 2015	Chief financial officer was not appointed within the due date as per Regulation	--	--	There was delay in appointment of Chief financial officer as per the timelines mentioned in Regulation 26A(2) of SEBI (LODR), Regulations, 2015	- -	As per Regulation 26A(2), Chief Financial officer was required to be appointed at the earliest and in any case not later than three months from the date of such vacancy	As per Companies Act, 2013, the appointment of Chief Financial officer can be made with 6 months, whereas as per Regulation 26A(2), appointment was required to made, at the earliest and in any case not later than three months from the date of such vacancy. Due to ongoing restructuring of the	Delayed compliance
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									company, the Chief Financial officer was appointed by delay of 6 days.	
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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 period prior to previous year	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

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

Sr. No.	Particulars	Compliance (Yes/No/Na)	Status	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with	YES		NO COMMENTS

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	the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).		
2.	<p>Adoption and timely updation of the Policies:</p> <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	NO COMMENTS
3.	<p>Maintenance and disclosures on Website:</p> <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	NO COMMENTS
4.	<p>Disqualification of Director(s):</p> <p>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.</p>	YES	NO COMMENTS
5.	<p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <ul style="list-style-type: none">Identification of material subsidiary companies.	YES	NO COMMENTS

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	<ul style="list-style-type: none">Disclosure requirement of material as well as other subsidiaries.		
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 SEBI LODR Regulations, 2015.</p>	YES	NO COMMENTS
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/during the financial year as prescribed in SEBI Regulations.</p>	YES	NO COMMENTS
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 N.A.	NO COMMENTS
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	NO COMMENTS

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10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	NO COMMENTS
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>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)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	<p>YES (instances as mentioned above)</p> <p>N.A.</p>	<p>Observations/remarks as mentioned above.</p> <p>NO COMMENTS</p>
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 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</p>	N.A.	NO COMMENTS

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	chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	N.A.	NO COMMENTS

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: 25.05.2026

PLACE: Ludhiana

For Pooja M. Kohli & Associates

Pooja M Kohli

Proprietor

FCS No. 7255

CP. No. 14836

Peer review no. 4815/2023

UDIN: F007255H000474348

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