

RESHI & ASSOCIATES

Company Secretaries

Office: - 3rd Floor Jeelan Shopping Mall, Near Aksa Mall, Sarai Payeen Srinagar J&K-190001.

Cell No: - +91-9906772505, +91-7006692593: email: - cs.jeelani@gmail.com, web: www.reshiandassociates.com

Secretarial Compliance Report Of Alps Industries Limited for the year ended 31st March, 2026

I, Ghulam Jeelani Reshi, the Proprietor of M/S. Reshi & Associates, FRN: JK536600 Company Secretaries having office at 3rd Floor, Jeelan Shopping Mall Near Hotel Aksa Sarai Payeen Srinagar J&K-190001 have examined:

- (a) all the documents and records made available to us and explanation provided by Alps Industries 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 certification for the year ended **31st March, 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 there under; and
 - (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”):

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



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- (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***
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021: ***Not Applicable***
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021: ***Not Applicable***
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
- (i) Other Regulations as applicable to the Company and circulars/ guidelines issued thereunder;



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Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular reference no. 20230316-14 and NSE Circular Ref No: NSE/CML/ 2023/21 both dated 16 March 2023 and Master Circular dated April 29, 2024 from NSE and April 30, 2024 from BSE.

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standards</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	Not applicable
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 in conformity with SEBI Regulations and has been reviewed & timely updated as per theregulations/circulars/guidelines issued by SEBI	Yes	Not applicable
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 on the website	Yes	Not applicable



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	<ul style="list-style-type: none"> • 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. 		
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	Not applicable
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	Yes	Not applicable
6.	<p><u>Preservation of Documents:</u></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	Not applicable
7.	<p><u>Performance Evaluation:</u></p> <p>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</p>	Yes	Not applicable



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8.	<p><u>Related Party Transactions:</u></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	Not applicable
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	Not applicable
10.	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	Not applicable
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></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>	No	As mentioned in the observations under table (a) appended below.



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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.	Yes	Not applicable
13.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	Not applicable

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 there under 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	Management Response	Remarks
1.	Regulation 30 of SEBI (LODR)	Securities and Exchange	Non compliance	Stock Exchange	Show cause	Late submission with	Nil	Company replied to the notice vide e mail	The delay in submission was purely	N.A.



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	Regulations, 2015 (“Listing Regulations”)	Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	with certain Listing Regulations.		notice issued by BSE vide mail dated 22.12.25	respect to Outcome of Board Meeting held on 12.10.25.		dated 23.12.25.	inadvertent	
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(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	Remarks
1.	Regulation 13 of SEBI (LODR) Regulations, 2015 (“Listing Regulations”)	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)	Delayed complied with certain Listing Regulations.	Stock Exchange	Fine	Delay in filing of investors grievances report for the quarter	Rs. 21, 240.00	Complied by company	Complied	N.A.



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		Regulations, 2015				ended June 30, 2023				
2.	Regulation 14 of SEBI (LODR) Regulations, 2015 (“Listing Regulations”)	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non compliance with certain Listing Regulations.	Stock Exchange	Promoters demat account frozen.	Non payment of Annual Listing fee for the Financial year 2024-25 for BSE and NSE	Nil	Matter resolved	Due to financial constraints company could not pay the Annual Listing fee. Subsequently company gone into CIRP as per NCLT orders. As of now there are no dues and share have derezeed	Complied



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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.

**For Reshi & Associates,
(Company Secretaries)**



(GHULAM JEELANI RESHI)
Company Secretary
FRN. JK536600

M.No. 8720
CP.NO.10020

Peer Review Certificate No.2125/2022
UDIN: F008720H000058506

Date: 9th April, 2026
Place: Srinagar, J&K