

Siddha Ventures Limited

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Phone: +91 33 2242 9199/5335 Fax: +91 33 2242 8667 e-mail: response@siddhaventures.com
Cin: L67120WB1991PLC053646

Date: 28.05.2025

To
The Department of Corporate Service
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400 001

BSE Scrip Code-530439

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2025

Dear Sir/Madam,

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, please find enclosed Annual Secretarial Compliance Report of the Company for the financial year ended 31st March 2025 issued by M/s Dash M & Associates, Company Secretaries.

Kindly take the above information on records

Thanking You,

Yours faithfully,

For **SIDDHA VENTURES LIMITED**

NIKITA
AGARWAL

Digitally signed by
NIKITA AGARWAL
Date: 2025.05.28
17:23:46 +05'30'

NIKITA AGARWAL
COMPANY SECRETARY & COMPLIANCE OFFICER



DASH M & ASSOCIATES

COMPANY SECRETARIES

(UCN: S2015WB331600)

**SECRETARIAL COMPLIANCE REPORT
OF
SIDDHA VENTURES LIMITED
(CIN - L67120WB1991PLC053646)
FOR THE YEAR ENDED 31ST MARCH, 2025**

I have examined:

- (a) all the documents and records made available to us and explanation provided by **SIDDHA VENTURES LIMITED (CIN - L67120WB1991PLC053646)** ("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 (**Not applicable to the Company during the Review Period**);
- (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 to the Company during the Review Period**);



- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(**Not applicable to the Company during the Review Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021(**Not applicable to the Company during the Review Period**);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (i) other regulations as applicable.

and circulars/ guidelines issued thereunder;

and based on the above examination, 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 thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviation/ Non-compliance	Action Taken by	Type of Action	Details of Violation	Financial Amount	Observations/ Remarks of Practicing Company Secretary (PCS)	Management Response	Remarks
-	-	-	-	-	-	-	-	-	-	-



(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 in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended 31-03-2024 (the years are to be mentioned)	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.	The listed entity has materiality policy and has disclosed the same in the website. However, in Corporate Governance Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.	The listed entity has materiality policy and has disclosed the same in the website. However, in Corporate Governance Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.	Regulation 30(4) of the SEBI (LODR) 2015.	Error was there in disclosure in Corporate Governance Report furnished for the Financial Year: 2023-24. No action was taken, nor penalty was imposed for such error.	Revised Corporate Governance Report, (rectifying the aforesaid error) was filed for the said period.	Yes, Done.
2	Authorisation to KMP for the purpose of determining materiality of an event or information and for the	Authorisation to KMP for the purpose of determining materiality of an event or information	Regulation 30(5) of the SEBI (LODR) 2015.	No authorisation was given to KMP and no detail disclosure in that regard under Regulation	From the financial year: 2024-25, the same has been	Yes, done.

	purpose of making disclosures to stock exchange(s) under this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the listed entity's website.	and for the purpose of making disclosures to stock exchange(s) under this regulation and the contact details of such personnel shall be also disclosed to the stock exchange(s) and as well as on the listed entity's website.		30(5) of the SEBI (LODR) 2015. No action was taken, nor penalty was imposed for such error.	complied with.	
3.	The listed entity has not disclosed the material events (Offer given by the subsidiary for subscribing its shares, the rejection of which would reduce the shareholdings in the subsidiary below 50%).	The listed entity has not disclosed the material events (Offer given by the subsidiary for subscribing its shares, the rejection of which would reduce the shareholdings in the subsidiary below 50%).	Regulation 30(8) of the SEBI (LODR) 2015.	Non-disclosure of material events in respect of the offer given by the subsidiary for subscribing its shares, the rejection of which would reduce the shareholdings in the subsidiary below 50%. No action was taken, nor penalty was imposed for such error.	The management has not considered the event as material as mentioned in the Report for the previous year.	No action has been taken.



4.	<p>The listed entity has a policy for making familiarised its Independent Directors as required under the said Regulation. However, the listed entity has not properly disclosed all the details in its website as required under Regulation 46(2)(i) of the SEBI(LODR) 2015 and also in Corporate Governance Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.</p>	<p>The listed entity has a policy for making familiarised its Independent Directors as required under the said Regulation. However, the listed entity has not properly disclosed all the details in its website as required under Regulation 46(2)(i) of the SEBI(LODR) 2015 and also in Corporate Governance Report furnished for the Financial Year: 2023-24 under Regulation 27(2) of the SEBI (LODR), 2015, it was disclosed as NA.</p>	<p>Regulation 25(7) of the SEBI (LODR) 2015.</p>	<p>Disclosures of details about familiarisation of Independent Directors on the listed entity's website and error in disclosing the same in Corporate Governance Report filed for the financial year: 2023-24. No action was taken, nor penalty was imposed for such error.</p>	<p>The Company has revised the disclosures on its website and revised Corporate Governance Report was also filed for the financial year: 2023-24.</p>	<p>Yes, done.</p>
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5	No disclosure as required under Regulation 25(8) of the SEBI (LODR) 2015 were found and the Board has also not taken note of the same as required under Regulation 25(9) of the SEBI (LODR) 2015.	No disclosure as required under Regulation 25(8) of the SEBI (LODR) 2015 were found and the Board has also not taken note of the same as required under Regulation 25(9) of the SEBI (LODR) 2015.	Regulation 25(8) & (9) of the SEBI (LODR) 2015.	No Disclosure under Regulation 25(8) of the SEBI (LODR) 2015 has been made by the Independent Directors and the Board has also not taken note of the same as required under Regulation 25(9) of the SEBI (LODR) 2015 for the financial year: 2023-24. No action was taken, nor penalty was imposed for such error.	From the financial year: 2024-25 onwards, the same has been complied with.	Yes, done.
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- (j) I/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).	No	The listed entity has still not fully complied with the provisions of Secretarial Standards issued by The Institute of Company Secretaries of India;
2.	Adoption and timely updation of the Policies:	Yes	The listed has formulated the policies and disclosed the same on the website. The listed entity has



	<p>(a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</p> <p>(b) 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.</p>		also filed revised Corporate Governance Report for the Financial Year (FY): 2023-24 under Regulation 27(2), for which some error was there in respect of the applicability of Policies.
3.	<p>Maintenance and disclosures on Website:</p> <p>(a) The listed entity is maintaining a functional website.</p> <p>(b) Timely dissemination of the documents/information under a separate section on the website.</p> <p>(c) 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.</p>	Yes	
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	
5.	<p>Details related to subsidiaries of listed entities have been examined w. r. t.:</p>	NA	The listed entity does not have any material subsidiary

	<p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>		
6.	<p>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.</p>	Yes	
7.	<p>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.</p>	Yes	
8.	<p>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.</p>	Yes	

9.	<p>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.</p>	Yes	
10.	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	<p>The listed entity had violated the provisions of the Regulations 3(5) & 3(6) the SEBI (Prohibition of Insider Trading) Regulations, 2015 in relation to SDD. However, the listed entity has made the compliance with respect to the same during the review period. But, on the BSE Portal, the listed entity has still been appearing as SDD non-compliant.</p>
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p>	No	<p>The listed entity has been appearing as SDD non-compliant on the BSE Portal. However, the listed entity has made compliance with respect to SDD during the financial year under review. Save as aforesaid, 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.</p>



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	There was no resignation by the statutory auditors during the review period. However, the term of erstwhile has come to an end and new Auditor has been appointed in his place during the period under review.
13.	Additional Non-compliances, if any:	-	No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.



Dash M & Associates,
Company Secretaries

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.

Place: **Kolkata**
Date: **28-05-2025**



For, **Dash M & Associates,**
Company Secretaries

Manojit Dash

MANOJIT DASH
Proprietor

Membership No.: ACS 21948
C. P. No.: 15170

UCN – S2015WB331600

PR NO.: 3574/2023

UDIN: A021948G000470154