



AN ISO 9001 COMPANY

Tel. : 08826794470, 71
E-mail : cenlub@cenlub.in
Website : www.cenlub.in
CIN : L67120HR1992PLC035087

(Regd. Office-cum-Unit-I)

CENLUB INDUSTRIES LTD.
Plot No.233-234, Sector-58,
Ballabgarh, Faridabad – 121004,
Haryana, India

Ref No; CIL/SEC-13/2025-26/85; May 29, 2025

To,
The General Manager
DCS-CRD
BSE Limited.
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai 400 001

Ref.: BSE Scrip Code No. 522251: ISIN INE627F01011

Ref.: Submission of Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2025 under Regulation 24A of SEBI (LODR) Regulations, 2015)

Dear Sir/Ma'am,

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

Pursuant to Regulation 24A of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2024 as obtained from Mrs. Apoorva Singh, Practicing Company Secretary, Delhi.

Further, the Annual Secretarial Compliance Report will also be filed in XBRL mode within the stipulated time period.

You are requested to please take on record the above said document for your reference and further needful.

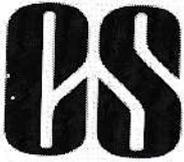
Thanking You,

Yours faithfully,

For CENLUB INDUSTRIES LTD


ANSH MITTAL
WHOLE TIME DIRECTOR
DIN: 00041986

Encl: As above



APOORVA SINGH
COMPANY SECRETARY

C-84, 8TH FLOOR, MEADOWS VISTA, RAJNAGAR EXTENTION, MORTA,
GHAZIABAD-201001, Ph. No.9971148606
Email id- csapoorvasingh007@gmail.com

Secretarial Compliance Report of CENLUB INDUSTRIES LIMITED
for the financial year ended 31.03.2025

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Cenlub Industries Limited (hereinafter referred as 'the listed entity')** having CIN: L67120HR1992PLC035087 having its Registered Office at PLOT NO-233 & 234 Sector-58, Faridabad, Haryana-121004. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my 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, I hereby report that in my opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I **Apoorva Singh, Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **Cenlub Industries Limited (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, 2025 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");

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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; **(Not applicable to the company during the period under review)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; **(Not applicable to the company during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the company during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non- Convertible Securities) Regulations, 2021; **(Not applicable to the company during the period under review)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- (k) Any other regulations and circulars/ guidelines issued thereunder as applicable to the company;

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: -.

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	Management Response	Remarks
1	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

Note: There is one Penalty imposed by BSE on One of the Whole Time Director of the company for Contra Trade activity in contravention of Regulation 9(1) and (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for which Fine of Rs.10,000/-was levied and the same was remitted by him to SEBI IEPF on June 11,2024.

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The company has received some queries from BSE, for which clarifications has been submitted by the company. While most of BSE queries has been closed, Status of some queries is still showing as pending, without any further observation by the exchange.

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

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	Management Response	Remarks
1.	Regulation 23 (9) of SEBI LODR 2015	Action under SEBI circular no. SEBI/HO/CFD/90d2//CIR/P/2023 dated 11.07.2023	Non-Compliance of SEBI Regulation of late Submission of Related Party Disclosure for the half year ended on 30.09.2023	BSE	Freezing of promoter demat account	-	5900	The company has submitted the reply immediately regarding the filing of related party disclosure for the half year ended on 31st September 2023, stating clearly that the financial results as on 30 th September 2023 of the company has been published on the Website on 9 th November 2023 and have tried to submit the Related Party disclosure as on 30 th September 2023 on the same day which is within time as required under of Regulation 23(9) of SEBI LODR in the prescribed format i.e. in XBRL mode,	Though the company has not made any non-compliance with the Regulation 23(9) of SEBI LODR Regulations in the intimation, hence the company has submitted	The company has already filed Related Party Disclosure for the half year ended on 30 th September 2023 of all its promoters/KMP in both PDF & XBRL formats as required under the said regul

							but unable to submit the same within time due to some technical errors occurred while submitting the declaration.	ed a letter to waive off the amount of Fine imposed by BSE and the reply from BSE is awaited till date.	ation and has applied to waive of the amount of Fine imposed by BSE and the reply from BSE is awaited till date.
							The company has already filed Related Party Disclosure for the half year ended on 30 th September 2023 of all its promoters/KMP in both PDF & XBRL formats as required under the said regulation and has applied to waive of the amount of Fine imposed by BSE.		

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

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remark 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 India (ICSI).	Yes	
2.	Adoption and timely updation of the Policies: i) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. ii) All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars / guidelines issued by SEBI.	Yes Yes	

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3.	<p>Maintenance and disclosures on Website:</p> <p>i)The Listed entity is maintaining a functional website.</p> <p>ii)Timely dissemination of the documents/ information under a separate section on the website.</p> <p>iii) Web-links provided in annual corporate goverhance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	
4.	<p>Disqualification of Director:</p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</p>	Yes	None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013
5.	<p>Details related to Subsidiaries of listed entities:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</p>	<p>NA</p> <p>NA</p>	The company does not have any subsidiary company.
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.</p>	Yes	
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 as prescribed in SEBI Regulations.</p>	Yes	
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</p>	<p>Yes</p> <p>NA</p>	

	committee.		
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	
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	
11.	Actions taken by SEBI or Stock Exchange(s), if any: The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	Yes	Mr. Ansh Mittal, Whole Time Director of the company has done Contra Trade activity in contravention of Regulation 9(1) and (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for which Fine of Rs.10,000/-was levied and the same was remitted by Mr. Ansh Mittal to SEBI IEPF on June 11,2024.
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.	N.A.	There is no resignation of statutory auditor during the period under review.
13.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	N.A.	There is no other Non-Compliance observed



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.

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Apoorva Singh
Company Secretary In Practice
M.No.: 35621
CP. No.: 13277
PR NO.: 1322/2021
UDIN: A035621G000477062

Place: Delhi
Date: 28/05/2025