



CIL/SE/R-12/2026-27/76

29.05.2026

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, 2026 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, 2026.

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, 2026 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,

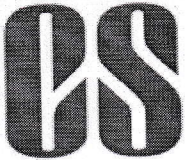
Yours faithfully,

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 31.03.2026

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-233-234-235, 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, 2026, 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, 2026 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");

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;

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- (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	Regulation 31-Non Submission of Shareholding pattern within prescribed time	Regulation 31	Non Submission of Shareholding pattern within prescribed	BSE	Fine	The company has submitted the shareholding pattern as on 30.06.2025 by the delay of one day	Rs. 2360/- including GST	The company has submitted the shareholding pattern for the quarter ended on 30.06.2025 on 22.07,2025 i.e. by the delay of one day.	The company has received the E-mail from BSE dated 14.08.2025 regarding	-

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			time for the Quarter ended on 30.06.2025					Thereafter, the company has received the E-mail from BSE on 14.08.2025 regarding the Non-Compliance of Regulation 31 and has imposed fine of Rs. 2360/- including GST and company has paid the same on 20.8.2025	the Non-Compliance of Regulation 31 and has imposed fine of Rs. 2360/- including GST and company has paid the same on 20.8.2025	
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Note: The company has received a mail dated 29/01/2026 related to the delay in compliance of regulation 30 (6) and Para A of Schedule III of SEBI LODR that the company has not submitted the Outcome of Board meeting within stipulated time. In this regard, the company has submitted the clarification that they have tried so many times to submit the outcome within stipulated time as required under of Regulation 30 (6)) of SEBI LODR, but unable to submit the same within time due to some technical issues occurred while submitting the outcome. However, the same has been submitted immediately, as soon as the issue got resolved.

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
	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

Note: One of the Promoter 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 him to SEBI IEPF on June 11,2024. 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.

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	-
3.	Maintenance and disclosures on Website: i)The Listed entity is maintaining a functional website. ii)Timely dissemination of the documents/ information under a separate section on the website. iii) 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	Yes Yes YES	-
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013
5.	Details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies.	NA	The company does not have any subsidiary company.

	(b) Requirements with respect to disclosure of material as well as other subsidiaries.	NA	
6.	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.	Yes	-
7.	Performance Evaluation: 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.	Yes	-
8.	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.	Yes NA	-
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/	Yes	Refer Table A as mentioned above

	subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.		
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: A035621H000496884

Place: Delhi
Date: 27/05/2026