



Satish D Kolhe
CS, BBA

S D Kolhe & Company
Company Secretaries

Secretarial compliance report of Jiya Eco-Products Limited for the year ended March 31, 2025

- A. I Satish Dattatray Kolhe (Practicing Company Secretary) have examined:
- all the documents and records made available to us and explanation provided by **Jiya Eco-Products Limited** (CIN: L01111GJ2011PLC068414) ("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 certification, for the year ended March 31 2025 ("Review Period") 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 Securities and Exchange Board of India ("SEBI");
- B. The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - Not Applicable During Reporting Period.
 - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (other regulations as applicable) and circulars/ guidelines issued thereunder;

**Office Address: First Floor, Belleza House, Kranti Park Lane
1, Near Manipal Hospital, Kharadi, Pune 411014.**

**Email: cs.satishkolhe@gmail.com
Mob: 8329883120, 8237857960**



C. (**) 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	Management Response	Remarks
1	SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019. Disclosure of default on payment /repayment of Debt Securities/Loan Within 07 days from the end of the quarter	SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019.	The Company has not complied with the requirement of, SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019.	-	-	The Company has not complied with the requirement of, SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019.	-	It is observed that, The Company has not complied with the requirement of, SEBI Circular SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019.	The non-compliance occurred due to the fact that the Company was under Corporate Insolvency Resolution Process (CIRP) in accordance with the order dated 24.04.2023 passed by the Hon'ble National Company Law Tribunal (NCLT), Ahmedabad Bench, and remained under CIRP until the NCLT order dated 11.12.2024. During the CIRP period, the management of the affairs of the Company vested with the Interim Resolution Professional (IRP) /	-
2	The Listed Entity shall file Compliance Certificate received by RTA (Demat) Within 15 days to Stock Exchange.	74(5) of SEBI (Depositories and Participants) Regulations 2018	The Company has not complied with the requirement of, 74(5) of SEBI (Depositories and Participants) Regulations 2018	-	-	The Company has not complied with the requirement of, 74(5) of SEBI (Depositories and Participants) Regulations 2018	-	It is observed that, The Company has not complied with the requirement of, 74(5) of SEBI (Depositories and Participants) Regulations 2018		
3	The Listed Entity shall file Statement of Grievance Redressal Mechanism, Within 21 days from the end of the quarter	Regulation 13(3) of SEBI (LODR) Regulations, 2015	The Company has not complied with the requirement of, Regulation 13(3) of SEBI (LODR) Regulations, 2015	-	-	The Company has not complied with the requirement of, Regulation 13(3) of SEBI (LODR) Regulations, 2015	-	It is observed that, The Company has not complied with the requirement of, Regulation 13(3) of SEBI (LODR) Regulations, 2015		



4	The Listed Entity shall file with stock exchange, Corporate Governance Report Within 21 days from the end of the quarter	Regulation 27(2) of SEBI (LODR) Regulations, 2015, read with Section II-B of the SEBI Master Circular (dated 30.06.2023),	The Company has not complied with the requirement of Regulation 27(2) of SEBI (LODR) Regulations, 2015, read with Section II-B of the SEBI Master Circular (dated 30.06.2023),			The Company has not complied with the requirement of Regulation 27(2) of SEBI (LODR) Regulations, 2015, read with Section II-B of the SEBI Master Circular (dated 30.06.2023),		It is observed that, The Company has not complied with the requirement of Regulation 27(2) of SEBI (LODR) Regulations, 2015, read with Section II-B of the SEBI Master Circular (dated 30.06.2023),	Resolution Professional (RP), and therefore, the usual compliance procedures and control systems were not in place or operational through the Board of Directors. The Company acknowledges the deviation and affirms that, IT has taken necessary steps to re-establish internal compliance mechanisms. The Company is committed to full regulatory compliance going forward.
5	The Listed Entity shall file with stock exchange, Shareholding Pattern, Within 21 days from the end of the quarter	Reg. 31(1)(b) Reg. 27(2) read with Section II-A of SEBI Master Circular	The Company has not complied with the requirement of Reg. 31(1)(b) Reg. 27(2) read with Section II-A of SEBI Master Circular			The Company has not complied with the requirement of Reg. 31(1)(b) Reg. 27(2) read with Section II-A of SEBI Master Circular		It is observed that, The Company has not complied with the requirement of Reg. 31(1)(b) Reg. 27(2) read with Section II-A of SEBI Master Circular	
6	The Listed Entity shall file with stock exchange Disclosure of detailed reasons for delay of submission for the results on due date/timeline. Within 01 working day of the due date of submission	Section III-A of SEBI Master Circular and BSE	The Company has not complied with the requirement of Section III-A of SEBI Master Circular and BSE			The Company has not complied with the requirement of Section III-A of SEBI Master Circular and BSE		It is observed that, The Company has not complied with the requirement of Section III-A of SEBI Master Circular and BSE	
7	As per the SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window should have been closed at least two days prior to the end of the quarter.	SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window	The Company has not complied with the requirement of SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window			The Company has not complied with the requirement of SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window		It is observed that, The Company has not complied with the requirement of SEBI (Prohibition of Insider Trading) Regulations, 2015, and company's Code of Conduct, the Trading Window	



8	The Listed Entity shall file with stock exchange Financial Results along with Limited review report/ Auditor's report Within 45 days from the end of the quarter	SEBI Reg 33 and Schedule IV read with Section III-A of SEBI Master Circular	The Company has not complied with the requirement of, SEBI Reg. 33 and Schedule IV read with Section III-A of SEBI Master Circular			The Company has not complied with the requirement of, SEBI Reg. 33 and Schedule IV read with Section III-A of SEBI Master Circular		It is observed that, The Company has not complied with the requirement of, SEBI Reg. 33 and Schedule IV read with Section III-A of SEBI Master Circular
9	Listed Entity Shall Update Website Within 02 working days from date of Change in content	SEBI LODR Reg. 46(3)	The Company has not complied with the requirement of, SEBI LODR Reg. 46(3)			The Company has not complied with the requirement of, SEBI LODR Reg. 46(3)		It is observed that, The Company has not complied with the requirement of, SEBI LODR Reg. 46(3)
10	The Listed Entity shall file with stock exchange Compliance Certificate on Structured Digital Database Within 21 days from the end of the quarter	Reg. 3(5) read with and 3(6) of SEBI (PIT) Reg., 2015	The Company has not complied with the requirement of, Reg. 3(5) read with and 3(6) of SEBI (PIT) Reg., 2015			The Company has not complied with the requirement of, Reg. 3(5) read with and 3(6) of SEBI (PIT) Reg., 2015		It is observed that, The Company has not complied with the requirement of, Reg. 3(5) read with and 3(6) of SEBI (PIT) Reg., 2015
11	The Listed Entity shall file with stock exchange Reconciliation of share capital audit Report Within 30 days from the end of the quarter	Reg. 76(1) read with BSE Master Circular	The Company has not complied with the requirement of, Reg. 76(1) read with BSE Master Circular			The Company has not complied with the requirement of, Reg. 76(1) read with BSE Master Circular		It is observed that, The Company has not complied with the requirement of, Reg. 76(1) read with BSE Master Circular
12	The Listed Entity shall file with stock exchange Statement of deviation(s) or variation(s) Within 45 days from the end of the quarter	Reg. 32 (6) read with Section III-C of SEBI Master Circular	The Company has not complied with the requirement of, Reg. 32 (6) read with Section III-C of SEBI Master Circular			The Company has not complied with the requirement of, Reg. 32 (6) read with Section III-C of SEBI Master Circular		It is observed that, The Company has not complied with the requirement of, Reg. 32 (6) read with Section III-C of SEBI Master Circular
13	The Listed Entity shall pay Fees and other charges to be paid to the recognized stock exchange(s) Within 30 days from end of the financial	SEBI LODR Reg. 14	The Company has not complied with the requirement of, SEBI LODR Reg. 14			The Company has not complied with the requirement of, SEBI LODR Reg. 14		It is observed that, The Company has not complied with the requirement of, SEBI LODR Reg. 14



	year								
14	A listed entity shall appoint a qualified company secretary and compliance officer	Reg 6(1) of SEBI (LODR) Regulation 2025	The Company has not complied with the requirement of, Reg 6(1) of SEBI (LODR) Regulation 2025			The Company has not complied with the requirement of, Reg 6(1) of SEBI (LODR) Regulation 2025		It is observed that, The Company has not complied with the requirement of, Reg 6(1) of SEBI (LODR) Regulation 2025	
15	The compliances of the listed entity are in accordance with the applicable secretarial Standards issued by the ICSI, as notified by the Central Government under section 118(10) of the companies act 2013 and mandatory applicable	Secretarial Standards Issued by Institute of Company Secretary of India.	The Company has not complied with the requirement of, Secretarial Standards Issued by Institute of Company Secretary of India.			The Company has not complied with the requirement of, Secretarial Standards Issued by Institute of Company Secretary of India.		It is observed that, The Company has not complied with the requirement of, Secretarial Standards Issued by Institute of Company Secretary of India.	

D. The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Com-pliance Require-ment (Regu-lations/ circulars/ guide- lines including specific clause)	Regu-lation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Remedial actions, if any, taken by the listed entity	Commen-t s of the PCS on the actions taken by the listed entity
<p>The non-compliances reported in the previous year's Annual Secretarial Compliance Report continue to exist as of the date of this report. The non-compliance occurred due to the fact that the Company was under Corporate Insolvency Resolution Process (CIRP) in accordance with the order dated 24.04.2023 passed by the Hon'ble National Company Law Tribunal (NCLT), Ahmedabad Bench, and remained under CIRP until the NCLT order dated 11.12.2024.</p> <p>During the CIRP period, the management of the affairs of the Company vested with the Interim Resolution Professional (IRP) / Resolution Professional (RP), and as a result, the usual compliance procedures and control systems were not in place or operational through the Board of Directors.</p> <p>The Company acknowledges these deviations and affirms that it has taken necessary steps to re-establish internal compliance mechanisms post-CIRP. The Company is fully committed to ensuring regulatory compliance going forward.</p>										



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

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.</p>	No	The non-compliance occurred during the period when the Company was undergoing Corporate Insolvency Resolution Process (CIRP) pursuant to the order dated 24.04.2023 passed by the
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 	No	Hon'ble National Company Law Tribunal (NCLT), Ahmedabad Bench. The Company continued to remain under CIRP until the NCLT order dated 11.12.2024. During this period, the management and control of the affairs
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 re- directs to the relevant document(s)/ section of the website 	No	of the Company were vested with the Interim Resolution Professional (IRP) / Resolution Professional (RP) in accordance with the provisions of the Insolvency and Bankruptcy Code, 2016. As a result, the regular compliance procedures and internal control mechanisms, which are ordinarily overseen by the Board of Directors,
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	No	



5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	<p>were not operational.</p> <p>Based on the information and explanations provided and records examined, it is noted that the deviation was a consequence of the CIRP process. It is further noted that the Company has since taken appropriate steps to re-establish its internal compliance framework and is making continued efforts to ensure adherence to applicable statutory and regulatory requirements in the future.</p>
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>	No	
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>	No	
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	NO	
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>	No	
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>	No	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>Following 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</p>	NO	



	various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder .		
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.	YES – No statutory auditor resigned during the financial year	
13.	Additional Non-compliances, if any: **additional non compliances list is given below in point E of this report.		

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 certify 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 the 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.

For S D Kolhe and Company.
Company Secretaries

Satish D Kolhe



Satish D Kolhe
Proprietor
ICSI Membership No: A61229
CP No: 23879
UDIN: A061229G000500877
Peer Review No: 5571/2024
Date: 30th May 2025.
Place: Pune