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, 2026

A. I Satish Dattatray Kolhe (Practicing Company Secretary) have examined:

(a) all the documents and records made available to us and explanation provided by **Jiya Eco-Products Limited** (CIN: L01111GJ2011PLC068414) ("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 March 31 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 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");

B. 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 During Reporting 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 During Reporting Period

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - Not Applicable During Reporting Period.

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable During Reporting Period

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - Not Applicable During Reporting Period

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) (other regulations as applicable) and circulars/ guidelines issued thereunder;

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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.	Com-pliance Require-ment (Regu-lations/ circulars/ guide-lines including specific clause)	Regu-lation/ CircularNo.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser-vations/ Remarks of the Practicing Company Secretary	Management Response	Re- marks
1	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 delayed compliance with the requirements of Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018.	-	-	The Company has delayed compliance with the requirements of Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018.	-	The Company has filed the certificates under Regulation 74(5); however, There was 9 days delay for June and September 2025 quarter, and 14 days Delay for December 2025.	The Company has duly filed the certificates under Regulation 74(5) of the SEBI (Depositories and Participants) Regulations, 2018. However, there was a delay of 9 days in filing the certificates for the quarters ended June 2025 and September 2025, and a delay of 14 days for the quarter ended December 2025. The delays occurred due to administrative and procedural reasons. The Management has taken necessary corrective measures and strengthened the internal compliance monitoring system to ensure timely filing of all future submissions within the prescribed timelines.	The Company has filed the certificates under Regulation 74(5); however, There was 9 days delay for June and September 2025 quarter, and 14 days Delay for December 2025.

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2	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 delayed compliance with the requirement of, Reg. 31(1)(b) Reg. 27(2) read with Section II-A of SEBI Master Circular	-	-	The Company has delayed compliance 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 delayed filed Shareholding pattern with Stock exchange: 3 days delay for September 2025 Quarter and 1 Day delay for December 2025 quarter.	The Company has filed the Shareholding Pattern with the Stock Exchange; however, there was a delay of 3 days for the quarter ended September 2025 and a delay of 1 day for the quarter ended December 2025. The delay occurred due to administrative and procedural reasons. The Management has taken corrective steps and strengthened the internal compliance monitoring mechanism to ensure timely submission of the Shareholding Pattern and other regulatory filings within the prescribed timelines in future.	It is observed that, The Company has delayed filed Shareholding pattern with Stock exchange: 3 days delay for September 2025 Quarter and 1 Day delay for December 2025 quarter.
3	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)	It is observed that the Company has not complied with the requirements of Regulation 46(3) of the SEBI (LODR) Regulations, 2015 relating to dissemination of information on the website. The non-compliance occurred due to oversight and administrative reasons. The Management has taken note of the same and initiated necessary corrective actions to update and maintain the website in accordance with the applicable provisions of SEBI (LODR) Regulations, 2015. Further, the Company	It is observed that, The Company has not complied with the requirement of, SEBI LODR Reg. 46(3)

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									has strengthened its internal compliance review mechanism to ensure continuous and timely compliance with website-related disclosures in future.	
4	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 year	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	The non-compliance under Regulation 14 of the SEBI (LODR) Regulations, 2015 occurred due to administrative reasons. The Management has taken necessary corrective measures to ensure timely payment of listing fees and compliance with the applicable provisions in future.	It is observed that, The Company has not complied with the requirement of, SEBI LODR Reg. 14
5	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		The Company had appointed a qualified Company Secretary and Compliance Officer during the review period. However, there was a vacancy in the position of Company Secretary and Compliance Officer for a certain period prior to the appointment made on 31 March 2026.	The Company has appointed a qualified Company Secretary and Compliance Officer during the review period. The vacancy in the position prior to the appointment made on 31 March 2026 was due to administrative and recruitment-related reasons, and the Management has taken necessary steps to ensure continuous compliance with the applicable provisions in future.	The Company had appointed a qualified Company Secretary and Compliance Officer during the review period. However, there was a vacancy in the position of Company Secretary and Compliance Officer for a certain period prior to the appointment made on 31 March 2026.

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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/ Circul ar 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	Comment s of the PCS on the actions taken by the listed entity

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.

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.

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.

Remedial actions, if any, taken by the listed entity for previous year non compliance:
The Management has taken necessary corrective and remedial measures in respect of the non-compliances observed during the previous financial year. The Company has already complied with most of the applicable provisions and has strengthened its internal compliance monitoring mechanism to avoid recurrence of such instances. Necessary steps have also been initiated for timely completion of the remaining compliances. The Management is continuously reviewing the compliance status and is committed to ensuring full compliance with the applicable provisions of SEBI Regulations and other applicable laws within the prescribed timelines.

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.	**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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	No	It is observed that the Company has not fully complied with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118(10) of the Companies Act, 2013. Certain procedural and compliance-related gaps were noticed during the review period with respect to adherence to the mandatory requirements of the applicable Secretarial Standards.

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2.	**Adoption and timely updation of the Policies:** • 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	It is observed that all applicable policies as required under the SEBI Regulations were not duly adopted/updated with the approval of the Board of Directors during the review period. Further, certain policies were not reviewed and updated within the prescribed timelines in line with the applicable SEBI Regulations, circulars, and guidelines issued by SEBI from time to time.
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website • Timely dissemination of the documents/ informationunder 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	It is observed that the Company was not fully compliant with the requirements relating to maintenance of a functional website and timely dissemination of information/documents under the relevant provisions of the SEBI (LODR) Regulations, 2015.
4.	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.:** (a) Identification of material subsidiary companies (b) Disclosure requirement 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, 2015.	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/during the financial year as prescribed in SEBI Regulations.	Yes	

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8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of AuditCommittee for all related party transactions; or (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.	Yes	
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. (SDD)	NO	
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder: It is observed that the equity shares of the Company were suspended from trading by the Stock Exchange during the review period due to non-compliance with the applicable provisions of the SEBI (LODR) Regulations, 2015 and/or listing requirements. The Company is required to take necessary corrective actions for revocation of the suspension and restoration of trading in its securities.	NO	

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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 **C** 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

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Satish D Kolhe
Proprietor
ICSI Membership No: F13606
CP No: 23879
UDIN: F013606H000506626
Peer Review No: 5571/2024
Date: May 27, 2026
Place: Pune, Maharashtra.