SANEH INDUSTRIAL INVESTMENTS LIMITED

Regd. Office : Delton House, 4801 Bharat Ram Raod 24, Darya Ganj, New Delhi-110002 (INDIA)
PHONE : 91-11-23273907
CIN : I74899DL1980PLC060079

Date: May 11, 2026

To,
The Manager,
The Calcutta Stock Exchange Limited
7, Lyons Range, Kolkatta-700 001

Subject: Annual Secretarial Compliance Report for the financial year ended March 31, 2026

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with circulars/notifications thereunder, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended on March 31, 2026, issued by M/s Vaibhav Sharma & Associates, Practicing Company Secretaries.

Kindly take the same on record.

Thanking You,

For Saneh Industrial Investments Limited

Saneh Industrial Investments Ltd. * New Delhi

Authorised Signatory

Encl: as above

VAIBHAV SHARMA AND ASSOCIATES
COMPANY SECRETARIES
DG-II, 268A, Vikas Puri, New Delhi-110048
Tel: 9953901363, Email: sharma.vaibhav129@gmail.com

SECRETARIAL COMPLIANCE REPORT OF SANEH INDUSTRIAL INVESTMENTS LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2026

We, Vaibhav Sharma & Associates, Company Secretaries have conducted the review of the compliances of the applicable statutory provisions and the adherence to good corporate practices by Saneh Industrial Investments Limited having CIN: L74899DL1980PLC060079 (hereinafter called "**the Company**"/" **the listed entity**"), having its Registered Office at Delton House, 4801, Bharat Ram Road, 24 Daryaganj, New Delhi - 110002. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing our opinion thereon.

Based on our 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, we hereby report that in our 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.

We, **Vaibhav Sharma and Associates, Practicing Company Secretary** have examined:

(a) all the documents and records made available to us and explanation provided by the listed entity,
(b) the filings/ submissions made by the listed entity to the stock exchange,
(c) website of the listed entity,
(d) any other documents/filings, as may be relevant, which has been relied upon to make this report,

for the year ended March 31, 2026 ("**Review Period**") in respect of the compliance with the provisions of:

(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
(b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The Specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - ***(Not Applicable for reporting audit period);***

Vaibhav Sharma & Associates
Company Secretaries
C.P. No. 10831
New Delhi

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeover) Regulations, 2011;

(d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - ***(Not Applicable for reporting audit period);***

(e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - ***(Not Applicable for reporting audit period);***

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - ***(Not Applicable for reporting audit period);***

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

and circulars/ guidelines issued thereunder and based on the above examination, we 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.	Deviation	Action Taken By	Type of Action	Details of Violation	Fine Amount	Observation / Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 17 of SEBI (LODR) Regulations, 2015	17	Board Composition	N.A.	N.A.	Board Composition	N.A.	Optimum Composition of Board of Directors is required to be maintained by the Company.	As the Company is going under delisting procedure, the company has appointed Independent Directors and is in the process of aligning the same with the Board Composition as per law.	The Company is not doing any business for last 20 years and is under delisting process.

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

Vaibhav Sharma & Associates
Company Secretaries
C.P. No. 10831
New Delhi

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We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

S. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	**<u>Secretarial Standards:</u>** 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	None
2.	**<u>Adoption and timely updation of the Policies:</u>** • 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 has been reviewed & timely	Yes Yes	None

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Company Secretaries
C.P. No. 10831
New Delhi

	updated as per the regulations/circulars/guidelines issued by SEBI.		
3.	**Maintenance and disclosures on Website:** • 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 redirects to the relevant document(s)/ section of the website.	Yes	None
4.	**Disqualification of Director:** None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.	Yes	None
5.	**To examine details related to Subsidiaries of listed entities:** (a) Identification of material subsidiary companies; (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, 2015.	Yes	None
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	None
8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all Related party	Yes	None

Vaibhav Sharma & Associates
Company Secretaries
C.P. No. 10831
New Delhi

	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.	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	None
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	None
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** No Actions 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.	Yes	None
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	None
13.	**Additional Non-compliances, if any:** No any additional non-compliance observed for all SEBIregulation/circular/guidance note etc.	Yes	None

Vaibhav Sharma & Associates Company Secretaries C.P. No. 10831 New Delhi

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.

For Vaibhav Sharma & Associates

Vaibhav Sharma & Associates Company Secretaries C.P. No. 10831 New Delhi

ACS - 30041

Place: New Delhi
Date: 11/05/2026

Vaibhav Sharma
Practicing Company Secretaries
ACS No: 30041
C P No: 10831
UDIN: A030041H000324434

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ACS - 30041