

May 27, 2025

To,
The Manager,
The Department of Corporate Services
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
25th Floor, Dalal Street,
Fort, Mumbai – 400 001

Script Code: 526654

<u>Subject - Annual Secretarial Compliance Report under Regulation 24 (A) of SEBI of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.</u>

Dear Sir/ Madam,

Pursuant to Regulation 24 (A) of SEBI of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2025.

We request you to take the same on your records.

Thanking you, Yours faithfully,

FOR THAKKERS DEVELOPERS LTD

NARENDRA MANOHARDAS THAKKER

Director

DIN: 00083224

Thakker Bunglow, Thakker Nagar, Gangapur Road, Nashik 422 005

THAKKERS DEVELOPERS LIMITED

Nashik Office: 7, Thakkers, Near Nehru Garden, Nashik - 422 001 Tel: 0253 2598925 / 2595458 Fax: 0253 2599225

Mumbai Office: 37/39, 3rd Floor, Kantol Niwas, Mody Street, Mumbai - 400 001 Tel/Fax: 022 22679166

Email: info@thakkersdevelopers.com

B.Com, L.L.B, F.C.S,

Company Secretary

Plot No-9, Yeolekar Mala, College Road, NASIK 422 005. Cell-9764002863

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial Compliance Report of M/s THAKKERS DEVELOPERS LTD (CIN - L45200MH1987PLC043034) having its registered office at 37/39, Kantol Niwas, Modi Street, Fort, Mumbai 400 001 for the financial year ended 31st March, 2025

I Ashok Suranahave examined:

- (a) all the documents and records made available to us and explanation provided by M/S THAKKERS DEVELOPERS LTD ("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 report,

for the year ended 31st March, 2025 ("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");

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;
- (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;

- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) other regulations as applicable and circulars/ guidelines issued thereunder;

ANNUAL SECRETARIAL COMPLIANCE REPORT

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:

Sr. No	Compliance Requirement (Regulations/circulars / guidelines includin g specific clause)	Regu- lation/ Circula r No.	Deviation s	Actio n Taken by	Type of Actio n	Details of Violatio n	Fine Amoun t	Observations/ Remarks of the Practicin g Company Secretar y	Man- age- ment Re- spons e	Re- mark s
	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

(b) 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/ circular s/ guide- lines includin g specific clause)	Regu- lation/ Circul ar No.	Deviatio ns	Actio n Take n by	Type of Action	Details of Violatio n	Fine Amou nt	Observations/ Remarks of the Practicin g Compan y Secretar y	Manage- ment Re- spons e	Re-mark s	PETARY
					Advisory/ Clarificatio				NEW CONTRACTOR	MPANY	CAPE

	n/ Fine/Show Cause Notice/ Warning, etc.		
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I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	Secretarial Standards:	Yes	Yes Complied
	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.		
2.	Adoption and timely updation of the Policies:	Vaa	Vac Camplied
	An II II II II II OFDI Decelelle	Yes	Yes Complied
	All applicable policies under SEBI Regulations 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 Paralletians and base been reviewed.		
	Regulations and have been reviewed & updated on time, as per the		
	updated on time, as per the regulations/circulars/guidelines issued by		
	SEBI.		
3.	Maintenance and disclosures on Website:		
	The Listed entity is maintaining a functional	Yes	Yes Complied
	website.		1 SI
	Timely dissemination of the documents/		
	information under a separate section on the		1 X (C ?
	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		\ <u>/</u> '
	website.		
4.	Disqualification of Director:		
٠.		Yes	Yes Complied
	None of the Directors of the Company are		
	disqualified under Section 164 of Companies Act,		
	2013 as confirmed by the listed entity.		
5.	Details related to Subsidiaries of listed entities		,
	have been examined w.r.t.:	Company does not	Yes Complied
		have any material	
	(a) Identification of material subsidiary companies	subsidiary	

	·			-
	(b) Disclosure requirement of material as well as other subsidiaries			
		<u>,</u>		4
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	Yes Complied	
7.	Performance Evaluation:	1		
	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	Yes Complied	•
. 8.	Related Party Transactions:	· · · · · · · · · · · · · · · · · · ·		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	Yes Complied	
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by	ĺ		
	the Audit Committee, in case no prior approval has been obtained.			
9.	Disclosure of events or information:		V - Complied	
	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	Yes Complied	•
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	Yes Complied	
11.	Actions taken by SEBI or Stock Exchange(s), if			
	any:	Yes	No action taken	URANA
	No 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 except as provided under separate paragraph herein (**).		No action taken	2033 2033 24 200 24 24 24 24 24 24 24 24 24 24 24 24 24
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries:	No resignation of auditor	Yes Complied	•
1	In case of resignation of statutory auditor from the	1		ال

	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		
13	Additional non-compliances, if any:	NA	Yes Complied
	No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.		

We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations.

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.

Place: Nasik

Date: 22/05/2025

Signature:

Name of the Practicing Company Secretary

FCS No.: 3559

CP No.: 6233

UDIN: F003559G000410251

PR No:1080/2021