

UDIN: F009000G000428452

Annual Secretarial Compliance Report
[Pursuant to Reg. 24A of SEBI (LODR) Regulations, 2015]
of
Creative Castings Limited
for the year ended 31st March, 2025

To,
The Board of Directors,
Creative Castings Limited

Registered office:
102, G.I.D.C. Phase-II
Rajkot Road
Dolatpara, Junagadh.

I, undersigned, being proprietor of M/s. M. Buha & Co., Company Secretaries, have examined:

- (a) all the documents and records those made available to me and explanation provided by Creative Castings Limited ("**the Company**"),
- (b) the filings / submissions made by the Company to the stock exchange,
- (c) website of the Company,
- (d) any other documents / filing, as may be relevant, which has been relied upon to make this report, for the financial year ended 31st March, 2025 ("**Review Period**") in respect of compliance with the provisions of:
 - (i) the Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, circulars, guidelines issued thereunder; and
 - (ii) 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 generally examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**LODR Regulations**");
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**not applicable as there was no reportable event during review period**);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018 (**not applicable as there was no reportable event during review period**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**not applicable as there was no reportable event during review period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (**not applicable as there was no reportable event during review period**);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 **(in relation to the Companies Act and dealing with client)**;
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(not applicable as there was no reportable event during review period)**; and
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 **(in relation to compliance with Rights & Obligations of Issuer under Chapter VII)**

and circulars/ guidelines issued thereunder; and based on the above examination, and considering the relaxations granted by regulator(s), I hereby report that, during the Review Period:

- (a) The Company 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
(1)	(2)	(3)	(4)	(5)
NIL				

Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
(6)	(7)	(8)	(9)	(10)	(11)
NIL					

- (b) The Company has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended	Compliance Requirement (Regulations/ circulars/ guidelines Including specific clause)	Details of violation / Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
(1)	(2)	(3)	(4)	(5)	(6)	(7)
There were no such continuing or recurring observations from the previous Secretarial Compliance Reports which required specific follow-up actions by the Company during the year under review period. The deviations reported in earlier reports were one-time, non-rectifiable in nature, and have not recurred.						

(c) I hereby report that, during the review period the compliance status of the Company with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
1.	Secretarial Standards: The compliances of the Company 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.	Yes	
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company. 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. 	Yes	
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The Company 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 	Yes	
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 Company.	Yes	
5.	Details related to Subsidiaries of the Company have been examined w.r.t.: <ul style="list-style-type: none"> Identification of material subsidiary companies Disclosure requirement of material as well as other subsidiaries 	NA	The Company do not have any subsidiary.

6.	Preservation of Documents: The Company 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 Company 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	
8.	Related Party Transactions: <ul style="list-style-type: none"> ▪ The Company has obtained prior approval of Audit Committee for all related party transactions; or ▪ The Company 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 NA	 No such instances during the review period.
9.	Disclosure of events or information: The Company 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 Company 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: No action(s) has been taken against the Company / 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.	Yes	
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor	NA	There was no resignation of statutory

	from the Company or any of its material subsidiaries during the financial year, the Company 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.		auditors from the Company.
13.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	Prima facie, no other non-compliances observed other than those reported herein.
14	Employee Benefit Scheme: The Company is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2)(za) of the LODR Regulations.	NA	No employee benefit scheme is currently in existence within the Company.

This report shall be read in conjunction with “Disclaimer” clause appended to this report.

M. Buha & Co.
Company Secretaries

Mayur Buha
Proprietor
FCS No. 9000, C. P. No. 10487
Junagadh, 24/05/2025
PRC No. 1566/2021

Disclaimer:**1. Scope of the Report:**

This report is limited to the statutory compliances on laws, regulations, guidelines, etc., listed herein, which have been applicable to the Company during the review period. The compliances made by the Company during the review period are observed in consonance with relaxations granted by regulators or due dates that were extended by regulators. This report is circumscribed to the financial year 2024-25 and the compliances due during the financial year.

2. Not an Audit or Opinion:

The review is conducted in accordance with the Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India (ICSI). My responsibility is to certify based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.

3. Management Representations:

The undersigned has taken management representation on matters that were represented to them, and supporting documents thereof were not available.

4. Disclaimer of Responsibility:

Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the Company. Undersigned's responsibility is to certify based upon examination of relevant documents and Information supplied in this regard. I disclaim any responsibility regarding the correctness and/or appropriateness of the documents supplied to me for the issuance of this report. The undersigned has conducted test checks on financial reporting, which are subject to review and reported by the statutory auditors of the Company.

5. Purpose:

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 Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

M. Buha & Co.
Company Secretaries

Mayur Buha
Proprietor
FCS No. 9000, C. P. No. 10487
Junagadh, 24/05/2025
PRC No. 1566/2021