

## SECRETARIAL COMPLIANCE REPORT OF SUPREME FACILITY MANAGEMENT LIMITED (Formerly known as Supreme Facility Management Private Limited) For the year ended 31<sup>st</sup> March, 2025

To,
The Board of Directors
Supreme Facility Management Limited
(Formerly known as Supreme Facility Management Private Limited)
Kohinoor World Tower T-3, 10th Floor, Office Nos. 1002 to 1005 old Pune Mumbai Highway,
PCMC, Chinchwad East, Pune, Maharashtra, India – 411 019

We M/s. Jaiswal A & Co., Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by M/s. Supreme Facility Management Limited (Formerly known as Supreme Facility Management Private Limited) ('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 document/filing, as may be relevant which has been relied upon to make this certification,

The following information for the year ended "31st March, 2025" in respect of compliance with the provisions of:

- (a) The 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; (Not Applicable during the review period)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not Applicable during the review period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable during the review period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable during the review period)

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- (h) Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment)Regulations, 2016; (Not Applicable during the review period)
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund)Regulations, 2009;
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (k) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (I) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable to the Company;

And based on the circulars and 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,
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/guidelines issued thereunder insofar as it appears from our examination of those records.
- (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:

S r. N o.	Compliance Requirement (Regulations/circul ars/guidelines including specific clause)	Regulation /Circular No.	Devia tions	Act ion tak en by	Ty pe of acti on	Deta ils of viola tion	Observation s/Remark of the Practicing Company Secretary	Manag ement respon se	Remarks
				Ni	1				

(d) The Listed Entity has taken the following actions to comply with the observations made in previous reports:

including specific by on Company Secretary			Devia tions	Act ion tak en by	Ty pe of acti on	Deta ils of viola tion	Fine amo unt	s/Remark of the Practicing Company	Manag ement respon se	Remarks
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(e) The listed entity has complied with the clauses 6(a) and 6(b) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 with regard to the Resignation of Statutory Auditors- There has been no resignation of the Statutory Auditors in the FY 2024-2025.

We 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 is accordance with the Auditing Standards (CSASto CSAS-3) issued by the Institute of Companisher Secretaries of India (ICSI)	1	Nil
2.	Adoption and timely updation of the policies:  a) All the applicable policies under SEB Regulations are adopted with the approval of the Board of Directors of the listed entity.  b) All the policies are in conformity with SEB regulations and have been reviewed and updated on time, as per the regulations/circulars/guidelines issued by SEBI		Nil
3.	<ul> <li>Maintenance and disclosures on Websites:</li> <li>a) The Listed Entity is maintaining a functional website.</li> <li>b) Timely dissemination of the documents/ Information under a separate section on the website.</li> <li>c) Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant documents / section of the website.</li> </ul>	Yes	Nil
4.	Disqualification of Directors:  None of the Directors of the Company is/are disqualified under Sec-164 of Companies Act 2013 as confirmed by the listed entity	Yes	Nil
5.	Details related to Subsidiaries of Listed Entities have been examined w.r.t.:  a) Identification of Material Subsidiary Companies  b) Disclosure requirements of material as well as other subsidiaries.	Yes Yes	
	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	Nil

7.	Performance of Evaluation:	Yes	Nii
	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	e s,	Nil
	SEBI regulations.		
8.	Related Party Transactions:	Yes	D:
	Audit Committee for all related party transactions.	f	Prior approval as take for all the related part transactions
	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.		
9.	Disclosure of events or information: The listed entity has provided all the required disclosures under Regulations 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.	Yes	Nil
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	Nil
11.	Actions taken by SEBI or Stock Exchanges, if any: Yes, National Stock Exchange has imposed the penalty on the Company for delay in disclosing the financial results for the Quarter and half year ended September 30, 2024.	Yes	The Company has submitted its response to exchange, providing reason of Technical Glitch and on the grounds of this Company has filed waiver request which is under process.
12.	Additional Non- Compliances, if any: No additional non compliances observed for any SEBI regulation / circular/ guidance note etc.	NA	No additional non compliances has been observed during the period under review

## Assumptions & Limitation of Scope and Review:

- 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.
- 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.

For JAISWAL A & CO.

Company Secretaries

Date : 26.05.2025

Place: Pune

Arun Kumar Jaiswal Proprietor Mem No 29827; C.P. No- 12281

UDIN- A029827G000446925 Peer Review Cert. No.: 2636/2022

\* The company was listed on 18th December 2024 National Stock Exchange (NSE), by the way of Initial Public Offerings (IPO) fresh issue of 6579200 equity shares resulting in total paid up capital of 24829200 equity shares.