



Date: 26.05.2025

To,
Corporate Governance Department
BSE Limited
P. J. Towers, Dalal Street,
Mumbai – 400001

Script Code: 538706 / Script ID: "ULTRACAB"

Sub: Annual Secretarial Compliance Report FY2024-25

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/1/27/2019 dated 8th February 2019, please find enclosed herewith the annual secretarial compliance report for the year ended on 31st March 2025 issued by M/s. Jain Preeti & Company, Practicing Company Secretaries (PR No.5964/2024, COP No: 14964).

Kindly take the same on your records. Thanking You

FOR, ULTRACAB (INDIA) LIMITED

Shingala Pankaj

V

Mr. Pankaj Shingala
Whole-time Director
DIN: 03500393

Digitally signed by Shingala Pankaj V
DN: c=IN, o=Personal,
pseudonym=b2407d46d3040e880e25168a7be184,
2.5.4.20=928dd99c5e986c3c842759f7bfffce3840749a55b23bd7443c5
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f1f1727dd49609f5c9, cn=Shingala Pankaj V
Date: 2025.05.26 15:54:44 +05'30'

Encl: as above

ULTRACAB (INDIA) LIMITED

Regd. Office & Works : Sr. No. 262,
B/H. Galaxy Bearings Ltd. Shapur (Veraval)
Dist. : Rajkot-360024. Gujarat. INDIA

Tel. : +91 2827 - 253122 / 23

E-mail : info@ultracab.in

Web : www.ultracab.in, | www.ultracabwires.com

CIN No. : L31300GJ2007PLC052394

Corporate Office : C-303, Imperial Heights,
Opp. Big Bazaar, 150 Ft. Ring Road, Rajkot-360005.
Tel. : +91 281 - 2588136 2588236

E-mail : ho@ultracab.in

Head Office : Office No. 1801, Haware Infotek Park,
Plot No. - 39/3, Sector No. 30-A, Vashi, Navi Mumbai - 400 703
Tel. : +91 22 - 20870306, 20870307

E-Mail: mumbai@ultracab.in





JAIN PREETI & COMPANY

(Company Secretaries)

(A Peer Reviewed Firm) PR No : 5964/2024 Membership No: F13336, COP NO: 14964

ADDRESS: E-21, 286-287, Sector-3, Rohini, Delhi-110085

Annual Secretarial Compliance Report of Ultracab (India) Limited (For the Financial year ended 31st March 2025)

[Pursuant to Regulation 24A of SEBI (LODR), Regulations, 2015 & SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019. & NSE Circular Ref No: NSE/CML/ 2023/30 dated April 10, 2023]

I, Preeti Jain, Practicing Company Secretary have examined:

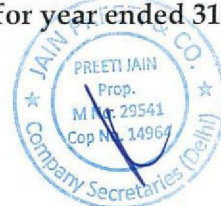
- All the documents and records made available to us and explanation provided by **Ultracab (India) Limited** ("the listed entity") having CIN Number **L31300GJ2007PLC052394**.
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ 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:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable for year ended 31st March 2025**
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable for the year ended 31st March 2025**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Securities) Regulations, 2021; **Not Applicable for year ended 31st March 2025.**



- g. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h. Other regulations as applicable

and circulars/guidelines issued thereunder;

and based on the above examination, I/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.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
AS PER ANNEXURE –II										

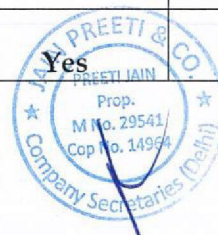
- b. The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations/Remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended 31 st March 2024	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
The observation / remarks are self-explanatory and no action is required to be taken on the same.						

I hereby report that, during the Review period the compliance status of the listed entity is appended as below:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/ 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),	Yes	NIL
2.	Adoption and timely updation of the Policies: • All applicable policies under SEBI Regulations	Yes	

	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.	Yes	NIL
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 re- directs to the relevant document(s)/ section of the website.	Yes Yes No	The web-Link of website are provided.
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	NIL
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.	Yes Yes	NIL
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	NIL
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	NIL
8.	Related Party Transactions: a. The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b. in case no prior approval obtain, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/ rejected by the Audit Committee	Yes Yes	NIL
9.	Disclosure of events or information: The listed entity has provided all the required	Yes	NIL



	disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		
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 Exchange(s), if any: 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 (**).	Yes	Except as provided hereunder no Action Was taken by SEBI or Stock Exchange. Show Cause Notice No. SEBI/EAD5/P/OW/2025/10855/I dated April 15, 2025 was issued on Promoter and Promoter group for Non-Compliance in the matter of Regulation 29(1) and 29 (3) of the SAST regulation 2015. Though it is out of purview of the reporting period for better compliance we have mentioned the same.
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	The statutory Auditor was not resigned during the period under review so this clause is not applicable
13.	Additional Non Compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations - **This Regulation is not applicable to company during period under review.**

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.

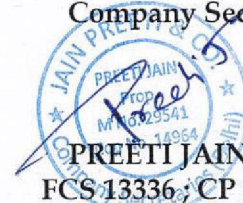
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.

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.

Place New Delhi
Date: 26.05.2025

For Jain Preeti & Associates
Company Secretaries



UDIN: F013336G000435560

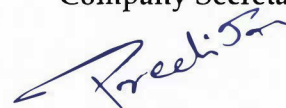
Peer Review Certificate No. 5964/2024
Firm Registration No. S2015DE320300

To,
The Members,
ULTRACAB (INDIA) LIMITED
SURVEY NO. 262, BEHIND GALAXY BEARING LTD.,
SHAPAR (VARAV, AL), RAJKOT, Gujarat, India, 360002

Our report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of SEBI Laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
5. As regards the books, papers, forms, reports and returns filed by the Company under these regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of Management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need not to be filed by the Company under the said regulations.

For Jain Preeti & Associates
Company Secretaries



Place New Delhi
Date: 26.05.2025

PREETI JAIN
FCS 13336 ; CP 14964
UDIN: F013336G000435560
Peer Review Certificate No. 5964/2024
Firm Registration No. S2015DE320300

Annexure -II (Forming Part of Secretarial Compliance Report of ULTRACAB (INDIA) LIMITED)										
Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines Including specific clause)	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	SEBI LODR REGULATION 2015	17 (1E)	The Previous Two Independent Director were Retired on 08.08.2024, New Independent Director were appointed on 06.09.2024	NA	NA	NA	NA	In the case of Retirement the vacancy should be filled on or before retirement date if Board is Non Constitute as per Regulation	The Independent Director was recommended to appoint before retirement date.	NA
2		17 (1C)	Mr. Pankaj Shingala - a whole time director was appointed on 17.05.2024 by Board but approval of Share Holder was taken on 06.09.2024	NA	NA	NA	NA	The approval of the Share Holder was taken after Three Months	Due to some Procedural Difficulties, The EGM was held little late in time.	NA
3		25 2 (a)	The Independent Director was appointed with Ordinary Resolution	NA	NA	NA	NA	It needs to be appointed through Special Resolution	The appointment will be rectified as soon as possible.	NA

DATE : 26/05/2025
PLACE New Delhi

for Jain Preeti & Associates
Company Secretaries

Preeti Jain

