SARVESH S. SRIVASTAVA & CO.
Company Secretaries & Insolvency Professional

117/Q/454,209 Indrapuri,
Sharda Nagar, Kanpur.208025
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SECRETARIAL COMPLIANCE REPORT OF STANDARD SURFACTANTS LIMITED FOR THE YEAR ENDED 31ST MARCH 2026

We, Sarvesh S. Srivastava & Co., Practicing Company Secretaries, have examined:

a) All the documents and records made available to us and explanation provided by Standard Surfactants Limited ("the listed entity"),

b) the filings/ submissions made by the listed entity to the stock exchanges,

c) web site of the listed entity,

d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March 2026 ("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 examined, include: -

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

(ii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
(Not Applicable)

(iii) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(iv) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable)

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(v) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 and amendments from time to time;
(Not Applicable)

(vi) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable)

(vii) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021;
(Not Applicable)

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

(ix) Securities and Exchange Board of India (Registrar to Issue and Share Transfer Agents) Regulations 1993,

(x) Securities and Exchange Board of India (Depositories and Participants) Regulations 2018,

(xi) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;

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 there under except in matters specified below:

Sr. 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
1	SEBI (LODR) Regulations, 2015	Regulation 17 (1) (a)	Composition of board was not in accordance with the regulation 17 (1) of SEBI (LODR) Regulations, 2015	BSE	Fine	Composition of board was not in accordance with the regulation 17 (1) of SEBI	As informed by the company, the company has received e-mail from BSE for imposing fine of Rs. 45000.00 for the quarter ended June	Composition of board was not in accordance with the regulation 17 (1) of SEBI (LODR)	The eligible candidature was being looked for, as company do not try to fill vacancies only to	-

						(LODR) Regulations, 2015	2025 on 29/08/2025.	Regulations, 2015	comply law in letter but also tries to bring expertise to the board who may add value to the board deliberations and help in taking quality decisions.	
2	SEBI (LODR) Regulations, 2015	Regulation 19 (1)	Composition of nomination and remuneration committee was not in accordance with the regulation 19 (1) of SEBI (LODR) Regulations, 2015	BSE	Fine	Composition of nomination and remuneration committee was not in accordance with the regulation 19 of SEBI (LODR) Regulations, 2015	As informed by the company, the company has received one e-mail from BSE for imposing fine of Rs. 18000.00 for the quarter ended March 2025 on 29/08/2025.	Composition of nomination and remuneration committee was not in accordance with the regulation 19 of SEBI (LODR) Regulations, 2015	The eligible candidature was being looked for, as company do not try to fill vacancies only to comply law in letter but also tries to bring expertise to the board who may add value to the board deliberations and help in taking quality decisions.	-

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

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Sr. 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
1	SEBI (LODR) Regulations, 2015	Regulation 17 (1) (a)	Composition of board was not in accordance with the regulation 17 (1) of SEBI (LODR) Regulations, 2015	BSE	Fine	Composition of board was not in accordance with the regulation 17 (1) of SEBI (LODR) Regulations, 2015	As informed by the company, the company has received only one e-mail from BSE for imposing fine of Rs. 5,31,000 for the quarter ended March 2025 on 29/05/2025. Apart from this no e-mail was received by the	Composition of board was not in accordance with the regulation 17 (1) of SEBI (LODR) Regulations, 2015	The eligible candidature was being looked for, as company do not try to fill vacancies only to comply law in letter but also tries to bring expertise to the board who may add value to the board deliberations and help in taking quality decisions.	The company appointed Independent Director on 10.04.2026 thus fulfilled conditions of Reg. 17 (1) (a) of **SEBI (LODR) Regulations**

							company for fine. However, on inspecting the list of non-compliant companies on BSE portal, a fine of Rs. 3,59,900 was also imposed on the company for the quarter ended on December 2024.			, **2015.**
2	**SEBI (LODR) Regulations, 2015**	**Regulation 19 (1)**	**Composition of nomination and remuneration committee was not in accordance with the regulation 19 (1) of SEBI (LODR) Regulations, 2015**	**BSE**	**Fine**	**Composition of nomination and remuneration committee was not in accordance with the regulation 19 of SEBI (LODR) Regulations, 2015**	**As informed by the company, the company has received only one e-mail from BSE for imposing fine of Rs. 2,12,400 for the quarter**	**Composition of nomination and remuneration committee was not in accordance with the regulation 19 of SEBI (LODR) Regulations, 2015**	**The eligible candidature was being looked for, as company do not try to fill vacancies only to comply law in letter but also tries to bring expertise to the board who may**	**The company appointed Independent Director on 10.04.2026 thus fulfilled condit**

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							ended March 2025 on 29/05/2025. Apart from this no e-mail was received by the company for fine. However, on inspecting the list of non-compliant companies on BSE portal, a fine of Rs. 1,48,680 was also imposed on the company for the quarter ended on December 2024.		add value to the board deliberations and help in taking quality decisions.	ions of Reg. 19 (1) of SEBI (LODR) Regulations, 2015.

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

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*

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1	**Secretarial Standard:** 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	
2	**Adoption and timely updation of the Policies:** • 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 have been reviewed & updated on time, as per the regulations /circulars/guidelines issued by SEBI	Yes	
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	
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	
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	No material subsidiary
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	
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	

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8	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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.	Yes	
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	
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	
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	
12	**Additional non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. except as provided under separate paragraph herein.	Yes	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes / No / NA)	Observations/ Remarks by PCS*
1.	**Compliances with the following conditions while appointing/re-appointing an auditor**		

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	i.If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.	NA	No Appointment /reappointment of Statutory Auditor has been taken place during the year under review. Material Subsidiary: No material subsidiary

2.	**Other conditions relating to resignation of statutory auditor**		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a). In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with	NA	No such resignation in listed entity. Material Subsidiary: No material subsidiary

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	relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable. c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor. ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	No such resignation in listed entity. Material Subsidiary: No material subsidiary

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Assumptions and limitations of scope and review:

1. **Compliances of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of listed entity.**

2. **Our responsibility is to report based on our examination of relevant documents and information. This is neither an audit nor an expression or 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 (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.**

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For Sarvesh S. Srivastava & Co.
Company Secretaries

SARVESH S. SRIVASTAVA KANPUR COMPANY SECRETARIES

(Sarvesh S. Srivastava)
Proprietor
CP No.: 20291
UDIN: A007719H000441341
Peer Review Number: 7108/2025 dated 14th August, 2025
Date: 22-05-2026
Place: Kanpur