



Ref: BBY/CS/001/08/26

May 21, 2026

**The BSE Limited**

Department of Corporate Services,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

**Sub: Annual Secretarial Compliance Report for the financial year ended March 31, 2026**

**Ref: 1. Regulation 24(A) and other applicable provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI Listing Regulations")**

**2. Scrip Code: 515147**

Dear Sir(s)/Madam(s),

Pursuant to Regulation 24A of SEBI Listing Regulations, please find enclosed herewith the Annual Secretarial Compliance Report duly issued by Ashish C. Doshi, Practicing Company Secretary, for the financial year ended March 31, 2026.

Kindly take this on your record.

Thanking you,

Yours faithfully

**FOR HALDYN GLASS LIMITED**

**DHRUV MEHTA  
COMPANY SECRETARY & COMPLIANCE OFFICER  
ACS-46874**

Encl: As above

**Corporate Office:** B-1201, Lotus Corporate Park, Off Western Express Highway, Goregaon (E), Mumbai 400 063  
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**CIN: L51909GJ1991PLC015522**

**[www.haldynglass.com](http://www.haldynglass.com)**

ANNUAL SECRETARIAL COMPLIANCE REPORT OF  
HALDYN GLASS LIMITED  
FOR THE YEAR ENDED MARCH 31, 2026

I, Ashish C. Doshi, A Peer reviewed Firm of Practicing Company Secretary having office at TF/1, Anison Complex, 3rd Floor, State Bank of India Lane, Swastik Soc., Nr. Stadium Circle, C. G. Road, Navrangpura, Ahmedabad-380 009 have examined:

- (a) all the documents and records made available to us and explanation provided by **HALDYN GLASS LIMITED** ("the listed entity") having its registered office at Village Gavasad, Dist. Padra, Baroda - 391430, Gujarat, India ("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 certification,

for the year ended March 31, 2026 ("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 (No events during the year);
- (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 (No events during the year);

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- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) other regulations as applicable

and circulars/ guidelines issued thereunder; However, it has been observed that there were no events requiring compliance under the regulations covered under para (b), (d), (e), & (f) mentioned hereinabove.

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:-

(b)

Sr. No. (a)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) (b)	Regulation/ Circular No. (c)	Deviations (d)	Action Taken by (e)	Type of Action (f)	Details of Violation (g)	Fine Amount (h)	Observations/Remarks of the Practicing Company Secretary (i)	Management Response (j)	Remarks (k)
1	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 29 (2), 29 (3) r.w. Reg 30	Delay in furnishing prior intimation about the meeting of the Board of Directors under Regulation 29(2)/ 29(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	BSE Limited	Fine Imposed	Delay in furnishing prior intimation about the meeting of the board of directors under Regulation 29(2)/ 29(3) of SEBI (Listing Obligations and Disclosure Requirements	Rs. 11,800/- (including GST)	There was delay in giving prior intimation about the meeting of the Board of Directors under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has clarified that the lapse was purely unintentional, arising from a miscalculation of trading days. The Company has assured that timely and accurate disclosures and	The Company has paid the fine amount

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						ments) Regulati ons, 2015			intimations will be made in strict complianc e with SEBI (LODR) Regulatio s, 2015, and reiterates its commitme nt to transparen cy and sound corporate governanc e.	
2	SEBI (Listing Obligatio ns and Disclosure Requireme nts) Regulation s, 2015	Regul ation 23(9) r.w. 30	Delay in submissi on of related party transacti ons for the half year ended Septemb er 30, 2025 under Regulati on 23(9) of SEBI (Listing Obligatio ns and Disclosur e Require ments) Regulati ons, 2015	BSE Limit ed	Fine Impose d	Delay in submissi on of related party transacti ons for the half year ended Septemb er 30, 2025 under Regulati on 23(9) of SEBI (Listing Obligatio ns and Disclosur e Require ments) Regulati ons, 2015	Rs. 5,900/- (includi ng GST)	There was delay of one day in submitting related party transaction disclosure for the half year ended September 30, 2025 under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company has clarified that the one-day delay in filing the disclosure of related party transactio ns for the half year ended September 30, 2025, was due to technical issues. Although the Company attempted to submit the disclosure within the prescribed timelines, the filing was not	The Company has paid the fine amount



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									accepted owing to such technical reasons. The Company affirms that it will continue to ensure timely and accurate disclosures and intimations in compliance with SEBI (LODR) Regulations, 2015, and remains committed to upholding the principles of transparency and good governance.
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(c) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**

Sr. No.	Observations/remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended ..... (the years are to be mentioned)	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



- 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.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	None
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; updated as per the regulations/ circulars/guidelines issued by SEBI.</li></ul>	Yes Yes	None
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate section on the website</li><li>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</li></ul>	Yes Yes Yes	None None None
4.	<b>Disqualification of Director:</b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	The listed entity has provided the required confirmation on the same.
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes Yes	None None
6.	<b>Preservation of Documents:</b> 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 the LODR Regulations.	Yes	None
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None



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8.	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes  NA	-  Refer 8 (a)
9.	<b>Disclosure of events or information:</b> 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	Actions taken by Stock Exchange as mentioned in point a) (** ) above
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> <del>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 (or)</del> The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column	Yes. BSE has taken action	Actions taken by Stock Exchange as mentioned in point a) (** ) above
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> 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	No such cases
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/ circular/guidance note etc. except as reported above.	Yes	No such cases

IT is further reported 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 Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 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.

# Ashish C. Doshi

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- b. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- c. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- d. 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.

**Date: May 21, 2026**  
**Place : Ahmedabad**



Sign: \_\_\_\_\_  
**ASHISH C DOSHI**  
**Practicing Company Secretary**  
**FCS No.: F3544**  
**COP No.: 2356**  
**P R Certificate No. : 6704/2025**  
**UDIN : F003544H000428122**