

**Date: - 27<sup>th</sup> May, 2025**

To,  
The Secretary,  
**The Calcutta Stock Exchange Limited**  
7, Lyons Range,  
Kolkata – 700 001

To,  
**Listing Department,**  
**Metropolitan Stock Exchange of India Ltd. (MSEI)**  
205A, 02nd Floor, Piramal Agastya Corporate Park,  
Kamani Junction, Lal Bahadur Shastri Road,  
Kurla West, Mumbai – 400 070

**Sub:- Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2025  
under Regulation 24A SEBI (Listing Obligations and Disclosure Requirements)  
Regulations, 2015**

**Scrip Code: 25061 (CSE), SHREETULSI (MSEI) ISIN: INE130D01037**

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, we are enclosing herewith the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2025.

Kindly take the same on record & oblige.

Yours faithfully,

**For Shree Tulsi Online.Com Limited**

VINOD KUMAR BOTHRA  
Digitally signed by  
VINOD KUMAR BOTHRA  
Date: 2025.05.27  
11:40:51 +05'30'

**Vinod Kumar Bothra**  
**(Managing Director & CEO)**  
**DIN: 00780848**



**SECRETARIAL COMPLIANCE REPORT  
SHREE TULSI ONLINE COM-LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2025**

*[pursuant to Regulation 24A of the SEBI (Listing Obligations and disclosure Requirements Regulations, 2015)]*

To,  
The Board of Directors,  
**Shree Tulsi Online Com-Limited**  
**CIN: L99999WB1982PLC035576**  
4 N.S. Road, 1<sup>st</sup> Floor,  
Kolkata-700 001

I, Veenit Pal, Practising Company Secretary, have examined:

- a) All the documents and records made available to me and explanation provided by M/s Shree Tulsi Online Com- Limited, (CIN:- L99999WB1982PLC035576) ("the listed entity")
- b) The filing/submission made by the listed entity to the stock exchange,
- c) Website of the listed entity,
- d) Any other documents/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31.03.2025 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 and as amended from time to time;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and as amended from time to time (**Not Applicable to the Company during the Audit period**);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and as amended from time to time;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not Applicable to the Company during the Audit period**);
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (**Not Applicable to the Company during the Audit period**);
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (**Not Applicable to the Company during the Audit period**);
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2018 regarding the Companies Act and dealing with client;
- i) Securities and Exchange Board of India (Depositories and Participants), Regulations, 2018; and circulars/guidelines issued thereunder;
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;

and circulars/guidelines issued thereunder;



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:-

Sr. No	Compliance Requirement (Regulations/ circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Violation Fine Amounts/ (INR)	Observation Remarks of the Practicing Company Secretary	Management Response	Remark
There are no such matters during the year under review.										

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

Sr. No	Compliance Requirement (Regulations/ circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Violation Fine Amounts/ (INR)	Observation Remarks of the Practicing Company Secretary	Management Response	Remark
There are no such matters during the year under review.										

- (c) I hereby report that during the review period the compliance status of the listed entity with the following requirement:

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	<b><u>Secretarial Standard</u></b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central government u/s 118 (10) of the Companies act, 2013 and mandatorily applicable.	Yes	I have examined the Secretarial Standards issued by Institute of Company Secretaries of India and as notified by Ministry of Corporate Affairs.
2.	<b><u>Adoption and timely updation of the Policies:</u></b> All applicable policies under Securities Exchange Board of India ('SEBI') Regulations are adopted with the approval of Board of Directors of the listed entity.	Yes	The Policy on Related Party Transactions has been reviewed/ updated in the year 2024-25



	All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations / circulars /guidelines issued by SEBI		
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p> <p>The listed entity is maintaining a functional website</p> <p>Timely dissemination of the documents/ information under a separate section on the website</p> <p>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirect to the relevant document(s)/section of the website</p>	Yes	No Remarks
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	No Remarks
5.	<p><b><u>To examine details related to Subsidiaries of listed entity:</u></b></p> <p>a) Identification of material subsidiary companies</p>	NA	No Remarks
	<p>b) Requirements with respect to disclosure of material as well as other subsidiaries</p>		Company is not having any material subsidiaries
6.	<p><b><u>Preservation of Documents:</u></b></p> <p>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</p>	Yes	No Remarks
7.	<p><b><u>Performance Evaluation:</u></b></p> <p>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</p>	Yes	No Remarks
8.	<p><b><u>Related Party Transactions:</u></b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions.</p>	Yes	Company has taken prior approval for all Related Party Transactions.
	<p>(b) In case no prior approval obtained, the listed entity shall provide detailed</p>	N.A.	No Remarks



	reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee		
9.	<b><u>Disclosure of events or information:</u></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	No Remarks
10.	<b><u>Prohibition of Insider Trading:</u></b> The listed entity is in compliance with Yes Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	No Remarks
11.	<b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b> Discontinuance of Trading of Company falling under the permitted to Trade category	NA	Pursuant to the termination of arrangement under section 13 of Securities Contract (Regulation) Act, 1956 with the Calcutta Stock Exchange (CSE), trading in the Company on CSE will be discontinued vide BSE Notice No. 20230718 dated 18 <sup>th</sup> July, 2023 regarding Discontinuance of trading of Companies falling under the permitted to trading category
12.	<b><u>Resignation of statutory auditors from the listed entity or in material subsidiaries:</u></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	No	There were no such transactions during the review period.
13.	<b><u>Additional Non-compliances, if any:</u></b> Additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	There were no additional non-compliances observed in the Company.

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. Not Applicable

#### **Assumptions & Limitations of scope and Review**

- 1. Compliance of 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.*
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 Regulations 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither and assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which management has conducted the affairs of the listed entity.*

For **Veenit Pal & Associates**  
Company Secretaries

**Veenit Pal**  
(Proprietor)



ACS : 25565  
CP : 13149  
Peer Review No. 1433/2021

UDIN:- A025565G000365003

Date: 16.05.2025  
Place: Mumbai