

September 30, 2026

**TO,
NSE LIMITED
EXCHANGE PLAZA, 5th FLOOR,
PLOT NO. C/1, G BLOCK, BANDRA-KURLA COMPLEX,
BANDRA (EAST), MUMBAI 400 051.
SYMBOL: INFINIUM**

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the period ended on September 29, 2026
for the purpose of migration of Equity Shares of the Company from SME Emerge to the
Main Board of National Stock Exchange of India Limited**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report for the period ended on September 29, 2026, issued by M/s. RTBR & Associates, Company Secretaries for the purpose of migration of Equity Shares of the Company from SME Emerge to the Main Board of National Stock Exchange of India Limited.

We kindly request you to take the above submission on your records.

Thanking You,

Yours faithfully,

For, Infinium Pharmachem Limited

SANJAYKUMAR
VITHTHALBHAI
PATEL

Digitally signed by
SANJAYKUMAR
VITHTHALBHAI PATEL
Date: 2026.09.30 11:52:46
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**Sanjaykumar Viththalbhai Patel
Managing Director
DIN: 00370715**

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
INFINIUM PHARMACHEM LIMITED
FOR THE PERIOD COMMENCED FROM 1st APRIL, 2026 TO 29th SEPTEMBER, 2026**

[Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended)]

To,
Infinium Pharmachem Limited
38 G I D C Sojitra Taluka: Sojitra
Dist: Anand, Sojitra,
Gujarat, India, 387240

We, M/s RTBR & Associates, Company Secretaries, Ahmedabad, having its Office at A-507, Shilp Corporate Park, B/H Rajpath Club, Bodakdev-380054, Gujarat, India, have examined: -

- a) all the documents and records made available to us and explanation provided by **INFINIUM PHARMACHEM LIMITED** (hereinafter called the Company) (CIN: **L24231GJ2003PLC043218**) having its registered office at **38 G I D C SOJITRA TALUKA: SOJITRA DIST: ANAND NA SOJITRA, GUJARAT 387240**.
- 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 period from 01 April 2026 to 29 September 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");

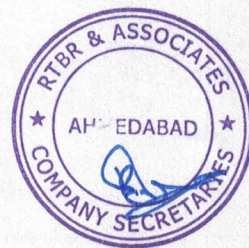
The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, includes: -

- (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)



Page 1 of 6

- 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; - (Not Applicable to the Listed Entity during the Review Period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the company during Audit Period).
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;-(Not Applicable to the Listed Entity during the Review Period);
- (g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the company during Audit Period).
- (h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) 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;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (k) Other regulations as applicable and circulars/guidelines issued thereunder
and based on the above examination, we hereby report that, during the Review Period:

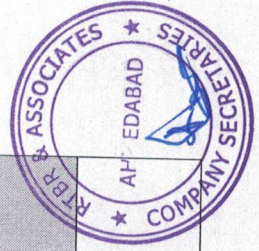


(a) The listed entity has complied with the provisions of the above Regulations and circulars guidelines issued thereunder, except in respect of matters as specified below:

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
Not Applicable										

(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	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
Not Applicable										



(c) 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 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 listed entity is/ are disqualified under Section 164 of Companies Act, 2013.	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	NA	----
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 for every financial year as prescribed in SEBI Regulation.	Yes	----



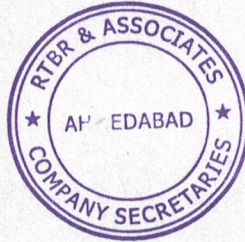
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) In case no prior approval, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified / rejected by the Audit Committee.	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 limit 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) 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.	NA	----
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	No event relating to the resignation of the auditor has occurred during the review period. Accordingly, this clause is not applicable.
13.	Disclosure of Employees Benefit Scheme Documents: The Listed Entity has complied with SEBI Circular SEBI / HO /CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024 for disclosure of Employee Benefit Scheme Documents on its website in terms of Regulation 46(2) (za) of LODR Regulations.	NA	----
14.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	There was no noncompliance observed in the listed entity.



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 Accounts of the listed entity.
4. This Report is prepared solely for the intended purpose of compliance with Regulation 24A(2) of the LODR Regulations and in accordance with the provisions of the applicable laws and regulations, to the extent applicable to the Company. This Report 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: Ahmedabad
Date: 30/09/2026



**For, RTBR & ASSOCIATES
COMPANY SECRETARIES**

Rajesh Tarpura (Partner)
COP: 5785, FCS: F6165
Peer Review No.: 1979/2022
UDIN: F006165H001670201