

Ref. No.: LASA/SE/26-27/10
Saturday May 30, 2026

To, Corporate Services Department BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001. BSE CODE –540702	To, Corporate Services Department National Stock Exchange of India Limited “Exchange Plaza”, Plot No. C/1, G Block Bandra-Kurla Complex, Bandra (E), Mumbai – 400 051. NSE CODE: LASA
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Dear Sir/Madam,

Subject: Submission of Annual Secretarial Compliance Report for the year ended 31st March 2026.

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 Dated 8th February, 2019, please find enclosed copy of the Annual Secretarial Compliance Report dated May 29, 2025 issued by M/s Shivam Sharma and Associates, for the financial year 2025-26.

This is for your information and record.

Thanking You
Yours Truly

FOR LASA SUPERGENERICS LIMITED

OMKAR HERLEKAR
CHAIRMAN AND MANAGING DIRECTOR
DIN: 01587154



**SECRETARIAL COMPLIANCE REPORT OF LASA SUPERGENERICS LIMITED FOR THE YEAR
ENDED 31ST MARCH, 2026.**

To,

Lasa Supergenerics Limited

Reg. Office: Plot no. C-4, C-4/1, MIDC Lote Parshuram
Industrial Area, Tal -Khed, Khed Ratnagiri MH 415722.

I Shivam Sharma have examined:

- all the documents and records made available to us and explanation provided by **Lasa Supergenerics Limited** (“the listed entity”),
- 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 certification,

for the year ended March 31, 2026 (“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; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- 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;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable to the Company during the review period)**



- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the Company during the review period)**
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; **(Not applicable to the Company during the review period)**

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.	De vi a tio ns	Actio n Take n by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remark
1	Every listed entity is required to appoint a qualified Company Secretary as the Compliance Officer.	Regulation 6(1) of SEBI LODR, 2015.	-	NSE and BSE	Fine	Non-compliance with Regulation 6(1) of SEBI (LODR) Regulations, 2015 due to non-appointment of a qualified Company Secretary as Compliance Officer for the quarter ended December 31, 2025.	Rs.20,060/- each BSE and NSE both (Including tax)	The Company was non-compliant with Regulation 6(1) of SEBI (LODR) Regulations, 2015 during the period from 29.08.2025 to 15.12.2025 due to vacancy in the office of Company Secretary & Compliance Officer. The Company appointed a new Company Secretary & Compliance Officer on 16.12.2025.	The appointment of the Company Secretary was delayed as the Company was unable to identify and finalize a suitable candidate within the expected timeline.	The Company has appointed a Secretary and Compliance Officer on 16.12.2025.



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Company Secretaries
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2	Every listed company is required to submit a statement showing the holding of securities and shareholding pattern separately for each class of securities in the prescribed format within 21 days from the end of each quarter.	Regulation 31(1) of SEBI LODR, 2015.	-	NSE and BSE	Fine	The Company failed to submit the Shareholding Pattern for the quarter ended 31.03.2026 within 21 days from the end of the quarter as prescribed under Regulation 31(1) of SEBI (LODR) Regulations, 2015.	Rs.49,560/- each BSE and NSE both (Including Tax)	The Company was non-compliant with Regulation 31(1) of SEBI (LODR) Regulations, 2015 for quarter ended 31.03.2026.	The Company received the quarterly report late due to delay in payment of bills by the Company. Consequently, the related compliance filings and submissions were also delayed.	The Company has filed Shareholding Pattern for the quarter ended 31.03.2026 on 12.05.2026.
3	Every listed entity is required to file the statement on shareholder complaints with the recognized stock exchange(s), on a quarterly basis within 21 days from the end of each quarter.	Regulation 13(3) of SEBI LODR, 2015.	--	NSE and BSE	Fine	The Company failed to submit the statement on shareholder complaints for the quarter ended 31.03.2026 within 21 days from the end of the quarter as prescribed under Regulation 13(3) of SEBI (LODR) Regulations, 2015.	Rs. 10,620/- each BSE and NSE both (Including tax)	The Company was non-compliant with Regulation 13(3) of SEBI (LODR) Regulations, 2015 for quarter ended 31.03.2026.	The Company received the quarterly report late due to delay in payment of bills by the Company. Consequently, the related compliance filings and submissions were also delayed.	The Company has filed the statement on shareholder complaints for the quarter ended 31.03.2026 on 12.05.2026.
4	A listed Company to file a quarterly corporate governance report with the stock exchanges within 21 days of quarter end.	Regulation 27(2)(a) of SEBI LODR, 2015	--	NSE and BSE	Fine	The Company failed to submit the Quarterly Corporate Governance Report for the quarter ended 31.03.2026 within 21 days from the end of the quarter as prescribed under Regulation 27(2)(a) of SEBI (LODR) Regulations, 2015.	Rs. 21,240/- each BSE and NSE both (Including tax)	The Company was non-compliant with Regulation 27(2)(a) of SEBI (LODR) Regulations, 2015 for quarter ended 31.03.2026.	The Company received the quarterly report late due to delay in payment of bills by the Company. Consequently, the related compliance filings and submissions were also delayed.	The Company has filed the Quarterly Corporate Governance Report for the quarter ended 31.03.2026 on 12.05.2026.



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5	A listed Company to file a Reconciliation of share capital audit report with the stock exchanges within 30 days of quarter end.	Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018.	--	--	--	The Company failed to submit the Reconciliation of share capital audit report for the quarter ended 31.03.2026 within 30 days from the end of the quarter as prescribed under Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018.	--	The Company was non-compliant with Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018 for quarter ended 31.03.2026.	The Company received the quarterly report late due to delay in payment of bills by the Company. Consequently, the related compliance filings and submissions were also delayed.	The Company has filed the Reconciliation of share capital audit report for the quarter ended 31.03.2026 on 12.05.2026.
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(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	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
1	The Company has appointed Mr. Umesh Pawar Executive Director in the Board Meeting held on 08.03.2024. and the Company has paid the fine levied by the BSE for Rs.3,95,300/- and by the NSE Rs.3,95,300/-.	March 31, 2025.	Regulation 17(1)	Non-compliance with the requirements pertaining to the composition of the Board including failure during the quarter ended 31.03.2024	The Company has appointed Mr. Umesh Pawar in the Board Meeting held on 08.03.2024 and complied with the applicable provision. And the Company had made payment of the fine within time to avoid any adverse action.	The Company appointed Mr. Umesh Pawar in the Board Meeting held on 08.03.2024 and complied with the applicable provisions of the Companies Act, 2013. Further, the Company made payment of the imposed fine within the prescribed time to avoid any adverse action by the regulatory authorities.
2	The Company inadvertently missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for	March 31, 2025.	Regulation 23(9) of SEBI (LODR) Regulations, 2015.	The Company inadvertently missed to Complied the provisions of Regulation 23(9) of SEBI (LODR) Regulation, 2015 for	The Company has filed Disclosure for quarter and year ended 31.03.2024 and the Company had made payment of the fine within time to avoid any adverse action.	The Company has duly filed the disclosure for the quarter and year ended 31.03.2024 after the due date and has complied with the applicable provisions. Further, the Company made payment of the imposed fine within the prescribed time to avoid any



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	quarter and year ended 31.03.2024.			quarter and year ended 31.03.2024.		adverse action by the regulatory authorities.
3	The Company inadvertently missed to Complied the provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024.	March 31, 2025.	<i>Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations).</i>	The Company inadvertently missed to Complied the provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024.	The Company has filed SDD as per the provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 for quarter and year ended 31.03.2024, on 29.04.2024.	--

- 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	<u>Secretarial Standards:</u> 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 under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed	Yes	None



	<p>entities.</p> <ul style="list-style-type: none">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.		
3	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none">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.	<p>Yes</p> <p>No</p> <p>Yes</p>	<p>The Company is in the process of updating and maintaining the website disclosures as required under Regulation 46 of the SEBI (LODR) Regulations, 2015.</p>
4	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</p>	<p>Yes</p>	<p>None</p>
5	<p><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></p> <ul style="list-style-type: none">Identification of material subsidiary companiesRequirements with respect to disclosure of material as well as other subsidiaries.	<p>NA</p>	<p>The Company does not have any subsidiary.</p>
6	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal</p>	<p>Yes</p>	<p>None</p>



	of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7	<u>Performance Evaluation:</u> 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
8	<u>Related Party Transactions:</u> (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	None Prior approval of Audit Committee was obtained for all the Related Party Transactions.
9	<u>Disclosure of events or information:</u> 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	None
10	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its promoters/ directors/	No	Details in above mentioned in the Point no. "A".



	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.		
12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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	None
13	<u>Additional non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc.	NA	No additional non-compliance was observed except details in above mentioned in the Point no. "A".

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. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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 (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.

5 This Report is limited to the Statutory Compliances on laws/ regulations / guidelines listed in our report which have been complied by the Company up to the date of this Report pertaining to financial year ended March 31, 2025.

6 The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to the verification of procedures on random test basis.

7. I 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 the random test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.

Thanking You
For Shivam Sharma & Associates
Company Secretaries

SHIVAM Digitally signed by
SHIVAM SHARMA
SHARMA Date: 2026.05.29
15:35:39 +05'30'

Shivam Sharma
(Proprietor)
M. No.: A35727, CP. No.: 16558
Peer Review Certificate No.: 1811/2022
UDIN: A035727H000534489
Place: Mumbai
Date: 29.05.2026